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ABSTRACT

This report presents the findings of the investigation, conducted by the National Advisory Council on Women's Educational Programs, on how federal programs affect girls and women. The council investigated the extent to which the Education Division of HEW has used the tools available to it (including enforcement of Title IX of the Education Amendments of 1972) to promote equity for girls and women in the three basic types of programs that it administers: formula grant programs, discretionary programs, and student financial aid programs. Information was collected through extensive interviews with division officials and female employees, questionnaires, and analyses of secondary data sources. Each of the three program types is analyzed in a separate chapter, with appropriate recommendations for eliminating sex discrimination in each area. Appendixes include relevant data and a guide to Office of Education programs. (Author)

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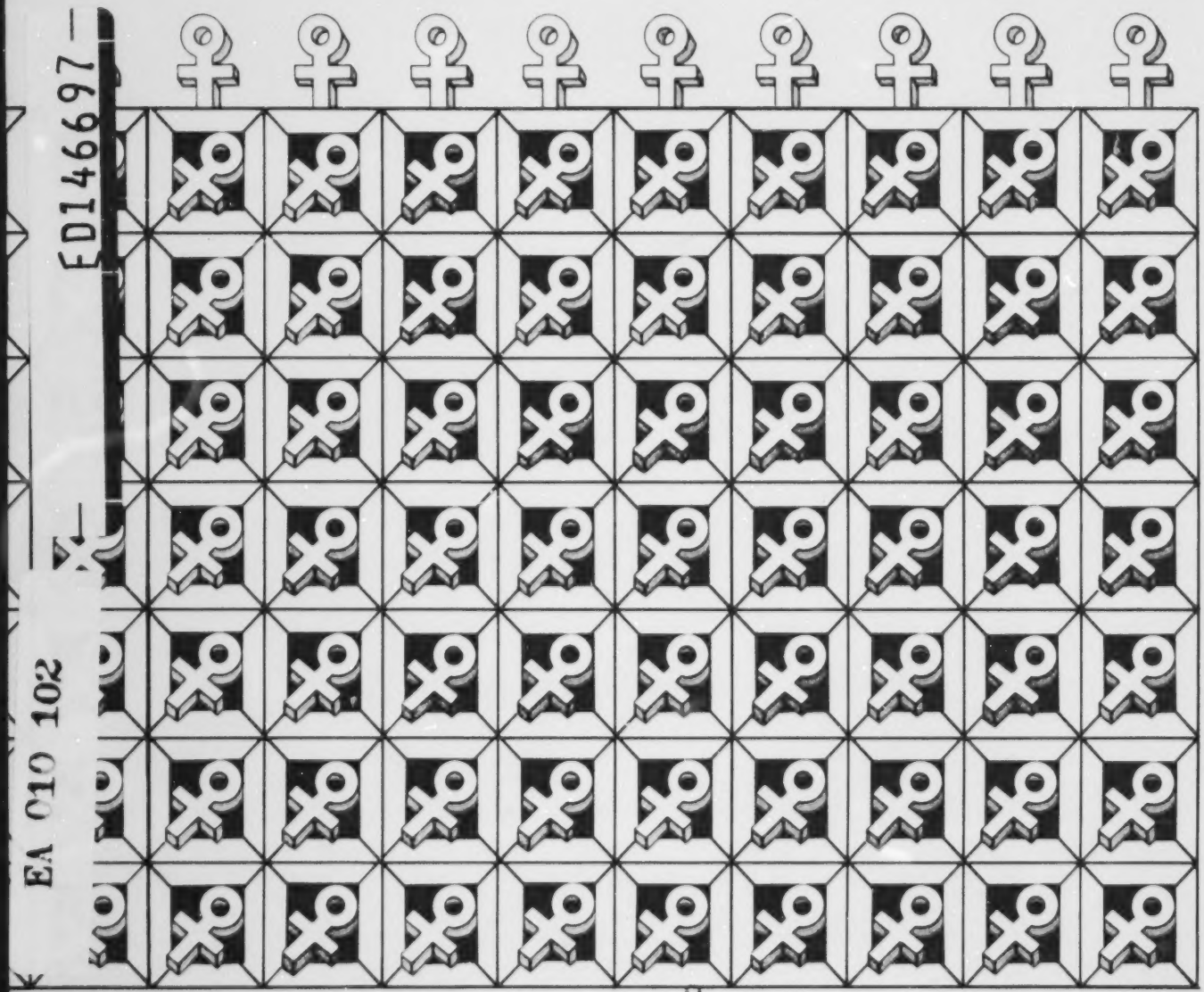

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Efforts Toward Sex Fairness in the Use of Education Division Funds

JoAnn M. Steiger & Eleanor Szanton

for
The National Advisory Council
on Women's Educational Programs

Washington, D.C.
August 1977

The National Advisory Council on Women's Educational Programs

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Preface

The National Advisory Council on Women's Educational Programs was created by law in 1974 to advise the Assistant Secretary for Education, the President, and the Congress on all Federal education programs as they affect girls and women. Responding to this mandate, the Council has commissioned five papers addressing the following questions: (1) To what extent do women participate in management and policy development in the Education Division?* (2) What efforts are made to assure sex fairness in the distribution and use of Federal funds? (3) What is the impact of Education Division programs on girls and women? (4) How sex fair are communications, products, and dissemination strategies? (5) What changes are needed in legislation, regulations, and enforcement to prevent sex discrimination and overcome sex bias and sex stereotyping?

These papers grew out of the Council's desire to follow up recommendations made in 1972 by an internal Office of Education Task Force. The Task Force report, *A Look at Women in Education: Issues and Answers for HEW*, documented discrimination against women throughout the nation's education system and made thirty-three recommendations for change in U.S. Office of Education practices. A follow-up report entitled *Challenging Sex Discrimination Through Organizational Reform (1975)*, by Holly Knox and Mary Ann Millsap, two of the original Task Force members, found that little had been done to implement these recommendations. The Council wanted to know what has been done since.

It became clear that -- because of internal reorganizations within the Education Division, changes in legislation, and changes in personnel -- simply tracing the original recommendations would not give an accurate picture of either accomplishments or needs. Therefore, the concept of the review was expanded to include a general analysis of what efforts the Education Division has made to improve opportunities for girls and women** and of what obstacles to equality of the sexes remain. The 1972 report is the baseline against which progress is measured.

These reports aim to identify key problems, describe exemplary efforts to promote sex fairness, and recommend practical changes in Education Division policy and practice that would improve equity for women.

METHODOLOGY

The information for these papers was collected between August 1976 and February 1977. Three basic sources were used:

**The Education Division comprises the Office of Education, the National Institute of Education, the Fund for the Improvement of Postsecondary Education, the National Center for Education Statistics, and the Office of the Assistant Secretary.*

***The term women as used in these reports includes both minority and non-minority women. The Council is fully aware of, and deeply concerned about, the double burden of discrimination borne by minority women. Wherever possible, minority women are discussed as a special subgroup.*

1. INTERVIEWS. A team composed of a consultant and a member of the Council staff interviewed more than thirty top officials in the Education Division, including deputy commissioners, associate commissioners, and associate directors. In addition, women occupying high-level positions in the Division were interviewed.

2. GROUP MEETINGS AND QUESTIONNAIRES. Further information was gathered from major subdivisions* through group meetings with employees who volunteered or were selected to help with the study by the person in charge of that unit. At the preliminary meeting with each group, questionnaires were distributed; follow-up meetings were held to discuss responses to the questionnaire.

3. ANALYSIS OF DOCUMENTS. Where they could shed light on the subject, documents such as affirmative action plans, grant guidelines, and products developed with Education Division funds were reviewed.

A draft report was written and circulated to all interested parties, including people who had participated in the information-gathering phase. The draft was revised to incorporate the suggestions of the reviewers where appropriate.

Although in some cases the information given to us by interviewees could be corroborated, in other cases limitations of time and funding prohibited a search for additional witnesses. Where appropriate, the sources of information are noted, but the names of some individuals giving information in the interviews have been withheld for their protection.

This report was written under contract with Steiger, Fink, and Kosecoff of McLean, Virginia.

Units that participated in the group meetings were:
The Bureau of Occupational and Adult Education
The Bureau of Elementary and Secondary Education
The Bureau of Education for the Handicapped
The Bureau of Postsecondary Education
The National Institute of Education
The Fund for the Improvement of Postsecondary Education.

In addition, the Office of Education's Regional Offices responded to the questionnaires.

Executive Summary

The Education Division of the Department of HEW spends over $8 billion for programs intended to serve three purposes: (1) to provide leadership in research, development, and innovation; (2) to fund special services for students whose needs are not met by standard educational programs, such as the disadvantaged and the handicapped; and (3) to promote equal access to education for everyone. In all three of these areas, however, the Education Division is failing to do all it could to provide educational equity to girls and women. (See Chapter I.)

The National Advisory Council on Women's Educational Programs, charged with advising the President and Congress on how Federal education programs affect girls and women, investigated the extent to which the Education Division has used the tools available to it to promote equity for girls and women in the three basic types of programs which it administers: formula grant programs, discretionary programs, and student financial aid programs. Information was collected through extensive interviews with Division officials and with female employees, group meetings with employees of major administrative subdivisions, questionnaires, and analyses of secondary data sources. (See Preface for a discussion of the methodology.)

The following report presents the findings of that investigation. Chapter I gives an overview of the structure and operations of the Education Division with respect to the three types of programs. Then, the three subsequent chapters examine the three program types to assess efforts by the Federal officials in charge of the programs to promote sex fairness. Each of these chapters concludes with a set of recommendations.

All of the formula grant programs are housed in the Office of Education (OE), the Division's largest unit, which in 1976 spent 53.8 percent of its budget on these programs. Because program funds flow through OE to state education agencies, local education agencies, and institutions of higher education in accordance with distribution formulas established by legislation, the Federal role is limited to assuring that the recipient is indeed eligible for such a grant and complies with the requirements set down in laws and regulations. Despite this relative lack of discretionary power, Federal administrators do have available to them a variety of tools for promoting equity for girls and women in these programs. In particular, they are charged with implementing Title IX of the Education Amendments of 1972, which bans sex discrimination in education programs receiving Federal aid. Among these tools are active monitoring to determine the extent to which aid recipients comply with Title IX, the provision of technical assistance to help recipients understand what the Federal law requires and how to comply with these requirements, and the initiation of steps to cut off funds to any program found to violate Federal proscriptions against sex discrimination. So far, however, these tools have been used only rarely, and then ineffectively; evidence of sex stereotyping and sex bias abounds, as exemplified by vocational education courses and education for

the handicapped. Many program officers are indifferent to their obligations with respect to promoting sex fairness and have been lax about informing formula grant recipients of Title IX requirements. In addition, in the majority of cases coordination and communication between program offices and the Office for Civil Rights, which is responsible for assuring nondiscrimination throughout HEW's programs, are lacking, as are both formal and informal checks during site-visit reviews. Nor have most program offices made significant efforts to provide information to grantees that would help them in implementing Title IX. (See Chapter II.)

Under discretionary programs -- which accounted for 9.3 percent of OE's 1976 budget and nearly all the programs of the National Institute of Education (NIE) and the Fund for the Improvement of Postsecondary Education (FIPSE), Federal officials have considerable authority in deciding what types of projects to fund and in selecting among competing bidders for grants and contracts. A few interested program officials have used a variety of tools to promote sex-fair practices among contractors and grantees. For instance, several programs have written into their grant regulations and guidelines and their requests for proposals, criteria concerned with sex fairness not only in the project content but also in the staffing pattern. Others have used advisory groups that include advocates of women's equity and representatives of minority groups among their members. One unit in OE is making efforts to train regional office staff responsible for monitoring projects to recognize instances of sex bias, sex stereotyping and sex discrimination and to take steps to correct them. Finally, several OE training and fellowship programs have attempted to assure female representation at all levels, though some programs are more successful at this than others. Nonetheless, various deficiencies are apparent. Women's concerns tend to be ignored or "ghettoized." Data on project staff by sex are difficult to obtain or interpret. Firms owned and managed by women rarely receive Federal funds. Review panels frequently manifest sex bias. In short, relatively few Federal officials in charge of discretionary programs have used the tools available to them to help increase opportunities for girls and women. (See Chapter III.)

Student financial aid programs, which accounted for 36.9 percent of OE's 1976 budget, are a type of formula grant program, but are treated separately here because of their unique characteristics. Assessing the sex fairness of these programs would require data on the total universe of need and the total universe of aid available for filling that need, and such data are not currently available. However, analyses that have been carried out indicate that women may be disadvantaged in several ways with respect to financial aid. For instance, compared with men, they receive smaller grant awards, they earn less money in term-time and summer jobs, and they are less likely to obtain loans. In addition, they may suffer disproportionately from legislative restrictions on aid to part-time students. (See Chapter IV.) On the basis of these findings, the Council makes the following recommendations for assuring sex fairness in the three types of programs administered by the Education Division:

FORMULA GRANT PROGRAMS (see pp. 5-11)

1. The Council repeats and expands the 1972 recommendation that program officers become more involved in monitoring problems of sex bias.
2. Coordination between program offices and the Office for Civil Rights should be improved.

3. All program officers should be prepared to provide detailed information to recipients on Title IX.
4. Every Bureau or equivalent subdivision in the Education Division should establish a position of Special Advisor to the Deputy Commissioner (or Director) on Women's Issues, analogous to the position in the Bureau of Occupational and Adult Education.
5. All these recommendations regarding sex fairness should be tracked through the Administration's management-by-objectives system.

DISCRETIONARY PROGRAMS (see pp. 13-22)

6. Concern with sex fairness should be made a priority of the Education Division and should be reflected in all programs.
7. The Council repeats and expands the 1972 recommendation that at least 10 percent of the appropriation for each and every discretionary program be spent on projects specifically targeted to making a special contribution to equity for women.
8. The Office of Career Education, and any future career education program authorized by new legislation, should have as a priority overcoming sex bias and sex stereotyping.
9. The Council repeats the concern of the 1972 Task Force with the staffing patterns of grantees and contractors and recommends that all bidders be required to submit information on title, salary, and responsibilities of top project staff by sex and that at least 5 points out of 100 be granted for staffing patterns which demonstrate balance.
10. The Council repeats and expands the 1972 recommendation that the Education Division encourage grant and contract applications from women.
11. The membership of all Education Division review panels should be balanced with respect to sex and race/national origin and should include people knowledgeable about problems of sex bias and sex stereotyping.
12. The membership of all Education Division project advisory committees should be balanced with respect to sex and race/national origin and should include people knowledgeable about problems of sex bias and sex stereotyping.
13. Because the resources available for projects targeted on sex fairness are limited, the offices making grants and contracts in this area should coordinate their efforts.

STUDENT FINANCIAL AID PROGRAMS (see pp. 23-26)

14. The HEW unit responsible for student aid should sponsor a comprehensive analysis of the need for, and availability of, student aid.
15. Eligibility for aid should be extended to part-time students who are enrolled less than half-time.

I.
Overview: Federal Funding of Education

In fiscal 1976 the Education Division had budget authority* of $8.2 billion. Of that, $8.1 billion (or 99 percent) was assigned to the Office of Education. Of the remainder, $70 million was allocated to the National Institute of Education (the agency responsible for education research and development) and $32.5 million went to the Office of the Assistant Secretary for Education (which includes the National Center for Education Statistics and the Fund for the Improvement of Postsecondary Education).[1]

The Federal role in education, though considerable, is not dominant. State and local governments spend more than twelve times as much as the Federal government spends on education.[2] Federal education programs have three purposes: (1) to provide leadership in research, development, and innovation to improve education; (2) to fund special services for students whose needs are not met by standard educational programs, such as the disadvantaged and the handicapped; and (3) to promote equal access to education for all. In all three of these areas, however, the Education Division is failing to do all it could to provide educational equity to girls and women.

Before considering what steps the Education Division could take to foster equity for girls and women, one must understand its structure and operations. This chapter describes the three basic types of programs housed in the Division: formula grants, discretionary programs, and student aid.* Each of the three subsequent chapters examines each program type, in turn, to assess efforts to promote sex fairness, and presents recommendations for improvement.

As the funding statistics cited above indicate, the Division's largest unit, the Office of Education (OE), accounts for most of these programs, with all the formula grant and student aid programs, and several of the discretionary programs, being located there. (Appendix A lists OE's 130 programs, showing the authorizing legislation, purpose, and fiscal 1976 budget allocation for each.) The National Institute of Education (NIE), the Division's other major operating unit, administers programs classified as discretionary.

FORMULA GRANT PROGRAMS**

Approximately $4.3 billion, or 53.8 percent of the Office of Education's 1976 budget, went to formula grant programs.[3] Many of these program funds flow through OE to state education agencies, local agencies, and institutions of higher education in accordance with distribution formulas established by legislation. In

*"Budget authority, defined as the amount appropriated by Congress for a program, usually differs slightly from the amount actually spent, or "outlays."

*Student aid programs are actually a type of formula grant but are treated separately because of their unique characteristics.

**For purposes of this paper, programs ranked by the Office of Education in four categories of limited controllability have been grouped together as formula grant programs. Each category, of course, has its own special characteristics. For details, see Appendix B.

such cases, the Federal role is simply to assure that the recipient agency is eligible and complies with the requirements set down in laws and regulations. If the agency meets these requirements, OE has little or no discretion as to whether to fund or how much to fund, though it is responsible for continually monitoring these programs to assure that all the requirements -- fiscal and programmatic -- are being met. Beyond this, some OE officials also provide leadership and technical assistance in implementing programs.

A prime example of a formula grant program -- and the largest single OE program -- is the $1.9 billion program known as Title I (of the Elementary and Secondary Education Act), which provides funds directly to local school districts to help them meet the special needs of educationally disadvantaged children. The formula, a complicated one, is based on the number of children in the school district who are from families below the poverty level, who receive payments under Aid to Families with Dependent Children, or who are supported in foster homes or institutions with public funds. The amount of the grant per child depends in part on the state's average current expenditure per pupil and its relation to the national average expenditure.

DISCRETIONARY PROGRAMS*

Approximately $750 million, or 9.3 percent of OE's 1976 budget went to programs over which Federal officials have a great deal of control.[4] In addition, nearly all the programs of the National Institute of Education (NIE) ($70 million) and the Fund for the Improvement of Postsecondary Education (FIPSE) ($11.5 million) fell in the so-called discretionary program category. Under the typical discretionary program, staff members have broad authority to decide what types of projects should be funded and to select from among competing bidders for grants and contracts. Constraints on this authority include:

- The language of the program's legislation;
- The intent of the legislation as established by the legislative history;
- The program's regulations;
- Restrictions placed on the appropriation (for example, the earmarking of NIE funds in FY 1976 for Federal research labs and centers);
- Established procedures for the awarding of contracts and grants;
- Other legislation such as the General Education Provisions Act and civil rights laws.

The procedures involved in awarding grants and contracts under the typical discretionary program are as follows: (1) The staff prepares the grant guidelines or, in the case of contracts, the request for proposals (RFP) which outlines the project desired and describes the experience requirements for bidders. The criteria to be used in selecting among competitors are spelled out, and a numerical weight is assigned to each criterion. The grant guidelines are published in the Federal Register. The availability of RFP's is announced in Commerce Business Daily. In addition, information may be sent directly to organizations on a program's mailing list. (2) A panel of reviewers is chosen to read the proposals submitted and to help select the winners. These panels usually comprise both government personnel and nongovernment experts. (3) Leading proposals are identified, and negotiations are carried out with the top candidates. (4) Depending on the nature of the program, the type of award, and the number of awards, additional steps may be taken.

All requirements for which the grantee or contractor will be held responsible -- for example, the product to be delivered and the date it is due, overhead rates, commitments to obey Federal law and regulations such as those forbidding use of convict labor or racially segragated facilities -- are spelled out in the final award documents. Items that have to do with the content and scheduling of the project constitute the "scope of work."

For a list of programs in this category, see Appendix B.

Assurances by the grantee or contractor that their operations are in compliance with Federal law and regulation form the "boiler plate" required for all awards.

Once these documents are signed, the program officers are responsible for monitoring the progress of the project to assure that all the agreed-to terms are met. Program officers have much more power to act if the award is a contract (which is written to purchase a specific service, with requirements spelled out in detail) than if it is a grant (which is much more flexible, encouraging freedom and creativity on the part of the recipient).

The Women's Educational Equity Act (WEEA) program, administered by OE's Women's Program Staff, is an example of a discretionary program. Established by the Education Amendments of 1974, WEEA has been allocated a modest $6.2 million to support, through grants and contracts, projects contributing to greater equity for women in education. A report on WEEA's FY 76 awards is available from OE,[5] and an analysis of its awards procedure is available from the National Advisory Council on Women's Educational Programs.[6]

STUDENT AID

Although a type of formula grant program, student aid programs have unique characteristics that justify their being considered separately. Intended to provide financial assistance to needy students in postsecondary institutions, these programs accounted for $3 billion, or 36.9 percent, of OE's fiscal 1976 budget.

In a recent reorganization of HEW, Secretary Califano consolidated seven programs within a new Bureau of Student Financial Assistance.[7] One of these programs, a guaranteed student loan program for students interested in the health professions, has not yet been funded. The other six, OE's current student aid programs, are described below, and their FY 76 funding levels are indicated.*[8]

Half-time as well as full-time students are eligible under the Federal law. Institutions, however, may choose not to enroll part-time students.

BASIC EDUCATIONAL OPPORTUNITY GRANT PROGRAM (BEOG):
($1.5 billion) Authorized by the 1972 Education Amendments, BEOG provides direct grants to both part-time and full-time students. The maximum award is $1,400, minus an expected family contribution based on income and assets; the minimum award is $200. At no time may the grant exceed one-half the actual cost of attendance (tuition and fees, room and board, books, expenses). Freshmen students were eligible during the program's first year of operation (1973-74), and with each succeeding year an additional class has become eligible. Thus full funding occurred during 1976-77.

SUPPLEMENTAL EDUCATIONAL OPPORTUNITY GRANT PROGRAM (SEOG):
($240 million) The SEOG program, in existence for ten years, is one of three campus-based student aid programs. "Campus-based" means that the funds are given directly to the participating institutions which, in turn, select students with "exceptional" financial need. The awards may be as great as one-half the total amount of student financial aid provided by the institution but may not exceed $1,500 annually.

STATE STUDENT INCENTIVE GRANT PROGRAM (SSIG):
($44 million) Enacted under the 1972 Education Amendments, the SSIG program began operating in 1974-75. Appropriations are made available to participating states and territories on a 50-50 matching basis, with states agreeing to maintain previously established funding levels. Awards up to $1,500 yearly are given to undergraduates who have substantial financial need and who meet specifically defined state requirements.

COLLEGE WORK-STUDY PROGRAM (CWS):
($509.8 million) Under this campus-based financial aid program created in 1964, institutions receive funds to pay 80 percent of the wages of students working on or off-campus in either public or nonprofit organizations. Students must be enrolled at least half-time, and their earnings are limited to an amount

no greater than the difference between their assessed financial need and the amount of other financial aid.

NATIONAL DIRECT STUDENT LOAN PROGRAM (NDSL):
($334.9 million) The oldest of the aid programs, NDSL was enacted in 1958 as the National Defense Student Loan Program. Participating institutions provide 10 percent matching funds for this low-interest (3 percent), campus-based loan program. Undergraduates may borrow a maximum of $5,000; graduate students are limited to $10,000, including loans for undergraduate study. There is a ten-year repayment period, beginning nine months after the borrower ceases full-time or half-time study. Up to 100 percent of the loan may be cancelled if the borrower takes a teaching job in an economically deprived area or teaches the handicapped; up to 50 percent of the loan may be cancelled if the borrower serves in the Armed Forces in an area of hostilities.

GUARANTEED STUDENT LOAN PROGRAM (GSL):
($654 million) Under the GSL program, loans are made directly by the lending institutions and guaranteed by the federal government or by state agencies. Undergraduates may borrow a total of $7,500, and graduates a total of $10,000. During the repayment period, which runs between five and ten years, interest is payable at the rate of 7 percent. For students who qualify, interest is paid by the Federal government during in-school, grace, and specified deferment periods.

II.

What efforts are made to assure sex fairness in formula grant programs?

Shortly after passage of the Education Amendments of 1972 - Title IX of which banned sex discrimination in education programs receiving Federal aid - an OE study group, the Commissioner's Task Force on the Impact of Office of Education Programs on Women, prepared a report analyzing sex bias in OE's programs and recommending ways in which OE could help implement Title IX.* An official response from the Commissioner of Education in 1973 pledged action on some of the recommendations. Now, however, more than four years later, the Council finds that few of these recommendations were ever actualized, that OE has never been systematically involved in implementing Title IX, and that any action taken to foster equity for girls and women has resulted more from the personal efforts of a handful of dedicated individuals than from management policy. The Carter Administration has indicated a serious interest in this issue, but the historical backdrop is bleak.

While the 1972 Task Force addressed a host of problems connected with OE's impact on women, the formula grant programs constitute by far the most important problem area for two reasons. First, as mentioned earlier, these programs accounted for 53.8 percent of OE's 1976 budget, the largest single component. Second, they give OE leverage on the activities of local school districts since, by accepting such funds, the districts automatically commit themselves to upholding Title IX not only in the particular activity supported by Federal funds but in all their other activities as well.

This chapter examines how effectively the available tools have been used by officials in OE and elsewhere in HEW to assure that recipients of OE's formula grants comply with Title IX. Instances of both success and failure in using these tools are given, ways in which they could be used more effectively are suggested, and recommendations for improvement are presented.

THE PROBLEM

Examples of sex bias and sex stereotyping abound throughout OE's formula grant programs and in the state and local activities they help finance. The dimensions of the problem can be understood by looking at vocational education and education of the handicapped, two areas funded by large formula grant programs which have received increasing attention in recent years.

VOCATIONAL EDUCATION courses train students for careers that do not require a baccalaureate. Most of these courses -- and the jobs to which they lead -- historically have been sex-stereotyped. Several recent studies document the extent of this bias,[9] in particular, showing that girls and women are heavily concentrated in certain traditionally female courses.[10] For example, in 1975 42 percent of all female students in vocational education courses were taking homemaking, and another 26 percent were taking office skills. By contrast, only 5.1 percent of female vocational education students were in courses designed to prepare them for jobs in the "trades and industry" category, a generally higher-paying field traditionally dominated by men. Many vocational education

**Information on the Task Force recommendations relevant to this report and on their implementation are available on request from the Council.*

classes are 100 percent male or 100 percent female, and in several categories one sex continues to predominate over the other even in terms of total participation nationwide. For example, trade and industry classes in the United States were 84.7 percent male in 1975, down only marginally from the 88.3 percent ratio of 1972.*

Largely as a response to evidence presented by women's groups, the new vocational education law passed as part of the Education Amendments of 1976 emphasize overcoming sex bias and stereotyping as one of its purposes. Specific requirements in this regard -- which, it should be noted, are additional to the requirements of Title IX -- are stated explicitly in the text of the law.

State and local programs of education for the handicapped -- recipients of significant increases in funding under Federal formula grants in recent years -- have also been plagued by problems of sex stereotyping, as acknowledged by Edwin Martin, Deputy Commissioner in charge of Education for the Handicapped.[11] He pointed out that people working to design and obtain funding for such programs have concentrated so much on establishing rights and gaining opportunities for handicapped children as a group that until recently they have paid little attention to the special needs of subgroups within the handicapped population.

Gillespie and Fink[12] cite the following as evidence of sex stereotyping in education programs for the handicapped: (1) many more boys than girls are referred to and enrolled in such programs, a disparity only partially explained by sex-linked congenital handicaps; (2) males admitted to treatment centers for the retarded have higher IQ's, on the average, than do their female counterparts, a difference that suggests girls must evince more serious intellectual subnormality than boys before they receive special treatment; (3) many special education curricula focus on social living skills and thereby foster traditional social roles (e.g., girls decorate while boys make furniture, boys practice athletics while girls practice cooking); (4) special education classes use sex stereotyped instructional materials (e.g., women are shown only in traditional occupations, brother is described as "strong and tall" while sister is pictured as "pretty and small"); and (5) prevocational training, which begins early in many special education programs, tends to emphasize instruction in housekeeping and domestic services for girls and in carpentry, construction work, and auto servicing for boys.

Cegelka[13] found that in vocational education programs for the handicapped, "success" is defined less stringently for female than for male students: A successful male graduate is one who is employed and economically self-supporting; by contrast, a female graduate is deemed successful if, after completing the program, she is self-supporting, is supported by a husband, or does housekeeping in exchange for support by her parents or others. Moreover, Cegelka found that retarded females earn only about a third as much as retarded males earn, whereas normal women earn about 62 percent of what normal men earn.*

RESPONDING TO THE PROBLEM

Identifying problems of sex bias and sex stereotyping in education programs supported by Federal formula grants is easy, remedying those problems presents a more formidable challenge. Obviously, Federal officials do not manage locally operated programs; they merely supervise the provision of Federal funds to state education agencies and to school districts. The main responsibility of the state and local officials who do manage the programs is not to the Federal government but to local program clients and taxpayers. Thus, as was noted in Chapter 1, Federal officials are limited in their ability to intervene in those cases where they perceive defects in the programs to which they are channeling Federal assistance.

**For a comparison of 1972 and 1975 figures in all areas, see Appendix C.*

**This was the ratio found in Cegelka's sample. Nationwide, according to 1973 Bureau of Labor Statistics data, women's wages were 56.6 percent of men's.*

Nevertheless, several significant tools are available to them. If a program receiving Federal education aid is found to violate Title IX or some other Federal proscription against sex discrimination, Federal officials can immediately initiate steps to cut off funds to that program. By actively monitoring the extent to which aid recipients comply with the strictures against such discrimination, they can increase the awareness of those prohibitions among state and local officials, thereby reducing the likelihood of sex bias. Such awareness is also increased by requiring aid recipients to commit themselves in writing to compliance with regulations against discrimination, and to certify that they remain in compliance. Other steps, such as giving local school districts technical assistance aimed at helping them understand what Federal law requires and how to comply with these requirements, may also play a role in promoting sex fairness.

So far, these tools have been used only rarely, and then ineffectively. The succeeding sections examine the reasons for this failure and explore some of the rather rare examples of success.

THE ROLE OF OE PROGRAM ADMINISTRATORS

Assuring that grant recipients comply with Title IX and other sex-fairness obligations is considered by some administrators of OE's formula grant programs as a minor part of their duties at most. For example, asked in an interview if he sent information on Title IX to grantees, an OE deputy commissioner replied flatly: "That's not our responsibility." Officials under his jurisdiction manifested similar attitudes. "I, as a program officer, have never brought my personal concern regarding anti-sex-bias legislation into discussion with local [government or school district] personnel," one such official stated on a questionnaire. In contrast with established practice regarding prohibitions against race discrimination, not until July 1976 did OE require grant recipients to include assurances that they were in compliance with sex-bias bans, and such assurances have not yet been received from all grantees. (See discussion below, p.7 .)

In view of this attitude, it is not surprising that, at no time since the passage of Title IX in 1972, have Federal officials invoked the power to withhold funds from a formula grant recipient for violating prohibitions against sex bias or sex stereotyping.*

COORDINATION BETWEEN OE AND THE OFFICE FOR CIVIL RIGHTS

To OE formula grant administrators, the principal responsibility for enforcing sex-fairness regulations rests with the Office for Civil Rights (OCR), the unit charged with assuring nondiscrimination throughout all HEW's programs, not just those in the Education Division. The Council has found, however, that coordination, and even communication, between OCR and OE officials is practically nonexistent. The attitude of program officers was epitomized by the statement of one OE associate commissioner in an interview: "We prefer not to deal with the policeman role."

In response to a questionnaire item on monitoring compliance with Title IX in formula grant programs, only one of thirteen officials indicated that information was exchanged between program administrators and OCR. Only two bureaus in OE reported that they had sought to establish a working relation with OCR. One of them, the Bureau of Postsecondary Education (BPE), had developed a letter of agreement with OCR that spelled out linkages, including the provision that a BPE liaison person accompany OCR representatives on site visits to BPE grant recipients. But the letter of agreement was allowed to lapse.[14] The Bureau of Occupational and Adult Education (BOAE) said that it has a policy whereby officials sent on site visits report possible violations of Title IX requirements to the OCR office in Washington

**Five organizations (Women's Equity Action League, the National Organization for Women, the Association for Women in Science, the Federation of Organizations for Professional Women, and the National Education Association) have joined together to sue HEW for poor enforcement of Title IX and Executive Order 11246.*

and, where appropriate, suggest follow-up investigations by regional OCR officials.

A pilot program of joint effort between OCR and Education Division officials, focusing on vocational education, has been proposed.[15] Under the program, a high-level task force would be responsible for:

- developing clear policies as to what constitutes compliance with Title VI*, Title IX, and Section 504** as regards vocational education;
- defining the responsibilities of OE Vocational Education line personnel in securing voluntary compliance with the Department's civil rights policies;
- formulating an enforcement compliance plan for the Office for Civil Rights, to include a compliance strategy, target priorities, staff allocation, and a timetable;
- delineating the process whereby compliance problems that come to the attention of vocational education program staff will be referred to the Office for Civil Rights; and
- analyzing the vocational education delivery system and suggesting ways to make it more responsive to the needs of minorities, women and the handicapped.

Of these five tasks, the second -- defining the responsibilities of program personnel in securing voluntary compliance -- is most directly related to the present inquiry. The swiftest route to implementing Title IX would appear to be voluntary efforts by educators at all levels. Federal officials can encourage such efforts by disseminating Title IX regulations and information on sex bias in education, by providing technical assistance to help educators implement changes, and above all by making it clear that Title IX is a priority.

ASSURANCES OF COMPLIANCE WITH SEX-FAIRNESS RULES

Despite the previously mentioned mandate in HEW's regulations for administering Title IX, only a few of OE's formula grant programs have taken steps to inform grantees of their responsibilities under Title IX. Of seventeen individuals responding to a questionnaire item on this point, only six replied that their program had sent out Title IX notices. Among those which had fulfilled their obligations in this regard were the Office of Indian Education (OIE), which reported that it required each grantee to sign an Assurance of Compliance with Title IX. Several individual programs within bureaus had taken similar steps.

Recently, however, greater progress has been made in this area, though it is still depressingly slow. In 1976, OCR developed a form (HEW Form 639) on which administrators of state and local programs receiving Federal grants were to provide assurances that they were in compliance with Title IX. In July 1976, 20,000 copies of this form were sent to state school officers, superintendents of local education agencies, and presidents of colleges and universities; they were asked to return the completed forms by September 30, 1976. When Secretary Califano took office in January 1977, he found that few forms had been returned, so in February he announced a new deadline of March 15. By that date, only 6,742 school districts and colleges of the 20,318 affected institutions had returned forms containing information that OCR found acceptable.[16]

Meanwhile, OCR had developed a revised compliance form (HEW Form 639-A) that was published in the *Federal Register* on March 16, 1977. Secretary Califano announced that schools which had not previously submitted acceptable forms would have sixty days after receiving the new forms to file them with OCR; those missing the deadline would risk a cut-off of funds.

**Title VI of the Civil Rights Act of 1964 prohibits recipients of Federal funds from discriminating on the grounds of race, color, and national origin.*

***Section 504 of the Vocational Rehabilitation Act of 1973 prohibits recipients of Federal funds from discriminating against the handicapped.*

The March 16 announcement in the *Federal Register* stated that the "Assurance of Compliance . . . must be submitted by all applicants for, and recipients of, Federal financial assistance awarded by the Department (of HEW) and subject to the provisions of Title IX . . . . The requirement that such applicants and recipients submit this Assurance is set forth in the Department's regulation implementing Title IX . . . ." This language made it clear that filing the Assurance of Compliance form would become part of the standard procedure in applying for Federal grants and contracts. Such is now the case, in accordance with a recommendation of the 1972 Task Force that such a systematic requirement be instituted.

MONITORING

Eliminating sex bias and sex stereotyping from the practices of grant recipients requires more than signatures on assurance forms, of course. It requires that OE program officers, who have the most direct and intimate contact with the grantees, give sustained attention to this matter. In a recent speech, Dr. Mary Berry, the new Assistant Secretary for Education, declared this to be a high-priority goal: "I consider it a primary responsibility for the Education Division to examine our programs to see that Title IX concepts are an integral part of program operations and that program officers are aware of overt and covert sex biases.[17]

To accomplish Dr. Berry's objective, Education Division program officers must not only recognize sex bias when they see it but also make efforts to find it. So far, an active search is evident in only a few OE programs. Of the thirteen OE officials who responded to a questionnaire item on the monitoring of formula grant programs for Title IX compliance, only three indicated that their checklists for site-visit reviews include Title IX questions. Five indicated that informal checks are made. BOAE has developed an extensive checklist, based directly on Title IX regulations, for the management evaluation review of state education agencies.*

Starting in 1977 the Bureau of Occupational and Adult Education began to include in its Management Evaluation Reviews of State Departments of Vocational Education several questions concerning compliance with Title IX. Different questions based on the Title IX regulation were investigated in different states, with the number of items per state varying from 7-14. The questions focus largely on procedural compliance (for example, do all application forms contain a notice that there is no sex discrimination?). Evidence of compliance was largely paper evidence (for example, the existence of an Affirmative Action Plan).

Of the 17 states* reviewed 6 were found to be in compliance on all items, 6 were rated in non-compliance on at least 1 item and 5 had at least 1 item marked "compliance to be determined." In each case of non-compliance or "compliance to be determined" the BOAE reviewer listed recommendations for bringing the state into compliance in specified follow-up procedures. The most common follow-up was an assignment that the Regional Office report back to the Central Office within 60 days concerning efforts by the state to remedy the problem. BOAE is following up through correspondence with the region.

TECHNICAL ASSISTANCE

Program offices have not, by and large, made significant efforts to provide information and technical assistance to grantees that would help them in implementing Title IX. Responsibility for developing technical assistance materials and funding workshops for state and local educators was left to the Women's Program Staff -- which so far has been able to fund only one workshop for elementary and secondary education and one for postsecondary education in each of HEW's ten re-

**See Appendix D for a copy of the BOAE Title IX Supplement to State Management Evaluation Report and for a copy of a sample report.*

**Puerto Rico and the Virgin Islands were also reviewed but, because of their unique situation, are not included in the discussion.*

gions* -- and to the General Assistance Centers, desegregation institutes, and education agencies funded under Title IV of the Civil Rights Act of 1964. Title IV, originally enacted to assist schools with race desegregation, was amended to include sex desegregation in 1972, at the same time Title IX was passed. Sex desegregation efforts were not implemented, however, until 1975. In her analysis of this program, Mary Ellen Verheyden-Hilliard[18] concludes that the locally perceived need for funding programs and activities in sex desegregation, as reflected in the first proposals received from the field, was from 44 to 88 percent higher than the funds finally granted. She also found that, in the 1975 and 1976 grants, sex desegregation efforts were not tracked separately from race desegregation efforts, making it difficult to ascertain how much was spent on problems of sex bias.

In fiscal 1977, funding for Title IV totaled $34.7 million. Of that, $14.8 went for twenty-seven Type A General Assistance Centers, and $7.4 million went for forty-four Type A State Educational Agency programs. Though all applications in both categories include sex desegregation components, OE does not have available an analysis that details the proportions of the funds devoted to this purpose.

Approximately $1.5 million of the FY 77 budget went directly to institutes dealing entirely with sex discrimination. The breakdown is as follows:

APPLICANT	FUNDING LEVEL
Univ. of Chicago	$ 147,148
Portland State Univ.	146,182
Rocky Mountain College	150,380
St. Cloud State Univ.	146,519
Univ. of Arizona	51,026
Rutgers University	187,605
North Dakota State Univ.	63,334
Boston University	76,524
California State Univ. (Fullerton)	167,631
Univ. of Colorado (Denver)	161,480
Simpson College	29,020
McPherson College	41,023
Univ. of California	84,657
Southeastern Mass. Univ.	75,212
TOTAL	$1,527,741

*These workshops, still in the planning stage when this report was written, will be held between June and December 1977.

CONCLUSIONS AND RECOMMENDATIONS

The Education Division has available to it a variety of tools that can be used to increase equity for girls and women in formula grant programs. In the past, no comprehensive, systematic efforts have been made in this regard, though a few interested individuals have sought out sex bias and have initiated exemplary practices to correct it, and the Carter Administration gives signs of taking seriously the charge of implementing Title IX. The Council makes the following recommendations about ways in which Federal officials who administer formula grant programs can foster increased equity for girls and women by using currently available methods.

1. <u>The Council repeats and expands the 1972 recommendation that program officers become more involved in monitoring problems of sex bias</u>. It should be official policy of the Department of Health, Education, and Welfare -- and of the Education Division in particular -- that management reviews and monitoring activities include, as a matter of course, reviews of compliance with Title IX and Title VI. Procedures should be established for following up any bias problems noted.
   a. Guidelines and checklists for site visits should include items on sex and race bias.
   b. Data collected on program operations should include data by-sex-by-race/national origin of applicants,* of students receiving ser-

*Applicant data are useful in determining recipient rates, which --though not by themselves evidence of causality -- are useful in supporting or refuting hypotheses of discrimination or bias.

vices, and of all staff involved in the delivery of services, and these data should be analyzed for evidence of inequity.

c. The Commissioner of Education should establish procedures and timetables for informing grantees that indications of possible sex or race bias have been found, for providing assistance to help them deal with these problems, and, if necessary, for moving to enforcement strategies.

2. Coordination between program offices and the Office for Civil Rights should be improved. The proposed pilot program of cooperative arrangements between the Office of Education and the Office for Civil Rights (see pp. 7-8) should proceed as quickly as possible, and successful results should be replicated throughout the Education Division.

3. All program officers should be prepared to provide detailed information to formula grant recipients on Title IX. The provision of such information, and of assistance in implementing Title IX, should be part of a system for monitoring and for remedying problems of sex bias, as discussed in Recommendation #1.

4. Every Bureau or equivalent subdivision in the Education Division should establish a position of Special Advisor to the Deputy Commissioner (or Director) on Women's Issues, analogous to the position in the Bureau of Occupational and Adult Education. The person who occupies this position should report directly to the Deputy Commissioner, should be included in top-level policy discussions and decisions, and should be provided with adequate resources. The position should be concerned with the content of programs and be separate from the position dealing with internal employment issues.

5. All these recommendations regarding sex fairness should be tracked through the Administration's management by objectives system.

III.
What efforts are made to assure sex fairness in discretionary programs?

Although they account for only 10 percent of Education Division dollars, discretionary programs are important for several reasons:

1. They provide an opportunity for the Education Division to fund projects aimed specifically at improving equity.
2. They provide the funds for the vast majority of research and development projects, which presumably help determine future directions for education.
3. They make available a variety of tools which Federal officials can use in overcoming sex bias and sex stereotyping.

SPECIAL PROJECTS TO FOSTER EQUITY FOR WOMEN

The extent to which discretionary programs reflect a concern with the problems of sex bias and sex stereotyping varies widely. Representing extreme concern are the two small programs specifically dedicated to equity for girls and women: the Women's Educational Equity Act (WEEA) program[19] in the Office of Education (allocated $6.27 million in FY 76) and the Women's Research Staff[20] in the National Institute of Education (allocated $190,000 in FY 76). Two programs with other mandates - the Fund for the Improvement of Postsecondary Education (FIPSE)[21] in the Office of the Assistant Secretary for Education ($11.4 million) and the Education and Work Group[22] in NIE ($11.4 million) - have funded a wide variety of projects targeted directly on the special needs of girls and women and have in addition demonstrated concern with sex fairness in their contracting procedures. Programs with some discretionary aspects that have funded special projects on women's concerns include vocational education innovative programs and the Special Projects Branch of the Division of Equal Educational Opportunities Programs.*

The vast majority of programs, however, have shown little interest in this issue, as is exemplified by the National Institute of Education, which administers only discretionary programs. In 1976 the NIE spent $57.4 million on projects. Of this, $190,000 (or 0.3 percent) went to the programs of the Women's Research Staff (part of the Educational Equity Group), and another $11.4 million went to the programs of the Education and Work Group, which funded many women's projects as well as other projects that dealt with sex bias in some way. But the remaining 80 percent of NIE's funds have gone to programs that, with rare exceptions, have done nothing to advance the cause of sex fairness: the Finance and Productivity Group ($17.4 million); the Basic Skills Group ($15.4 million); the Dissemination and Resources Group** ($8.5 million); and the

This Branch administers Title IV of the Civil Rights Act of 1964. (See p. 10 above.) A full analysis of the extent to which this program has addressed the needs of women is available in Mary Ellen Verheyden-Hilliard's Title IX of the Education Amendments of 1972: A Progress Assessment Memorandum, available from the Secretary's Advisory Committee on the Rights and Responsibilities of Women, DHEW, South Portal Building, Room 624 D, Washington, D.C. 20202.

***The Dissemination and Resources Group has initiated efforts to train women researchers (see p. 17) and in addition has addressed the problem of sex*

Educational Equity Group (minus the Women's Research Staff, $4.5 million). A striking example of the tendency to isolate women's concerns in the "women's ghetto" is NIE's approach to helping students deal with mathematics avoidance, a common problem among women. The Education and Work Group* -- which is concerned with preparing people for occupations requiring mathematics -- is funding some needed work in this area, but nothing has been done by the Basic Skills Group; indeed, of the thirty papers commissioned by the latter unit for a conference on mathematics, not one dealt with women and math.

TOOLS TO FOSTER EQUITY

As mentioned in Chapter I, Federal officials responsible for discretionary programs have more leverage to influence the practices of grantees and contractors than do those responsible for formula grant programs. But rarely have they used this leverage to foster equity for girls and women. Only in a few programs where the staff has been particularly concerned with this issue have steps been taken to this end. The following sections discuss examples of such programs and make recommendations for further use of these tools.

CRITERIA IN GRANT REGULATIONS, GUIDELINES, AND RFP'S

The most powerful weapon available to discretionary officers lies in their formulation of grant regulations and guidelines and requests for proposals (RFP's). These documents, prepared by the Federal staff, define the project to be conducted, the qualifications required of applicants, and the weights to be attached to each specified criterion in choosing among the proposals submitted.

Several programs have written into their regulations and guidelines criteria dealing with sex fairness in project content. One particularly good example is provided by the Bureau of Occupational and Adult Education's guidelines for grants, to demonstrate exemplary experience-based career education programs.* Among the criteria for awarding these grants during fiscal 1976 were that all recipient programs contain "a systematic plan to eliminate existing sex bias and sex-role stereotyping and to avoid introducing these elements into the activities undertaken with respect to the demonstration project," as well as "a strong emphasis on sex-fair guidance, counseling, placement and follow-up services."[23] These requirements were clarified in a later portion of the regulation specifying what weight these criteria would be given in the evaluation of proposals. Out of a total ranging between 230 and 290 points, depending on the type of program, 30 points were allocated for:

> ELIMINATION OF SEX BIAS AND SEX-ROLE STEREOTYPING.
>
> (i) The selection, development, and/or alteration of all cur-

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bias in products developed with Federal funds (see Sex Fairness in Communications, Products, and Dissemination Strategies, another report in this series).

**Some earlier work on this topic was funded by the Fund for the Improvement of Postsecondary Education, a unit with a good track record on women's issues.*

***The demonstration projects for fiscal 1976 were funded under Part D of the Vocational Education Amendments of 1963, as amended in 1968. (This law was again amended in October, 1976, and Part D was consolidated with other programs into a discretionary program called Programs of National Significance). Part D was a $16 million hybrid program, with the characteristics of both formula grants and discretionary programs. OE classified it as a formula grant program because 1) half the funds went directly to the states by formula to fund state-level innovative programs and 2) the second half of the funds was allocated to specific states based on a formula. The content of projects and the selection of grantees within a given state, however, were the prerogative of Federal officials. The Federal staff was responsible for writing grant guidelines, selecting awardees, and monitoring the grants.*

riculum, instructional materials, and evaluation instruments for use in the demonstration projects to insure an absence of sex-role stereotyping;

(ii) An emphasis on the placement of young people in exploration and training opportunities without regard to traditional practices in vocational education and employment;

(iii) The identification of women and men in non-traditional work roles who will work with younger women and men both in school and in the work place when the younger persons have an interest in a similar but non-traditional area or when they need encouragement to pursue some other non-traditional area for which they have developed an interest.[24]

An additional 10 points were allocated to the criterion of sex-fair guidance and counseling, and that criterion was also described in detail.[25]

Precise language such as this lets potential grantees know just what actions they can take to overcome sex bias and sex stereotyping, offers a potential reward for such actions in the form of improved access to Federal funds, and clarifies the criteria for monitoring in this area.

TRAINING PROJECT MONITORS

Criteria on sex fairness may be written into contracts, but if the program monitors do not understand these criteria, they will not be able to monitor their implementation. An example of the consequences of this problem is provided by NIE's Education and Work Group, which funded a project to develop a Career Education Installation Handbook designed for school officials. According to one questionnaire respondent:

> The Handbook was in its final stages when a new NIE project officer was assigned to the project. She recognized that the Handbook was sex biased in terms of both language and illustrations. The previous NIE project officer and the contractor's staff did not recognize this bias. The handbook currently is being revised, based on the recommendations of the current NIE project officer. This points to the lack of a systematic approach to ensuring sex fairness in material and program development, and the overreliance on individual project officers' ability and commitment to monitor projects for sex fairness.

Another example comes from the BOAE FY 76 projects on experience-based career education, funded under Part D. As was mentioned earlier, the guidelines included explicit criteria on overcoming sex stereotyping. Federal officials found, however, that the regional staff members responsible for monitoring the projects were extremely uncomfortable with these items. As a result, a training and technical assistance program to aid the regional monitors was proposed in the headquarters office. (For details, see Appendix E).

STAFFING

Of the thirty-five people responding to the questionnaire item "In discretionary programs, where are problems of sex bias likely to occur?" fifteen checked "staffing patterns of grantees and contractors." The second most frequently marked alternative, "processes used to choose projects" was checked by only eight respondents.

The 1972 Task Force recommended that OE and NIE collect data indicating what role women play on the staffs of contractors and grantees. OE has not acted on this recommendation. In December 1976, NIE published an analysis of the Equal Employment Opportunity forms submitted by NIE's major contractors,[26] but -- as explained in the introduction to the report -- the data from these forms are difficult to interpret because the job categories (for example, "official/managerial" and "professional") are general,

and the definitions provided are not really appropriate for research organizations. That each contractor interpreted the categories differently is suggested by certain striking inconsistencies: For example, while the Southwest Education Development Laboratory (SEDL) had thirty-four officials/managers out of 152 employees, the Southwest Regional Laboratory (SRL) had only four officials/managers out of 155 employees. Thus, it is hard to know what to make of the reported fact that 41 percent of SEDL's officials/managers, but none of SRL's, were women. Undoubtedly, contractors differ greatly in the opportunities they provide for women, but these forms fail to capture the differences.

Another difficulty pointed out in the NIE report is that, for institutions not devoted entirely to research and development activities (such as school districts and academic institutions), data were collected on all employees, not just those working on government contracts and grants. Therefore, one can tell nothing about the sex composition of the project staffs.

Although the NIE report is useful in demonstrating what kinds of data collection and analyses are needed, a much more painstaking effort is required if the Education Division is to know the true composition of the workforce of contractors and grantees.

Only a few of the officials interviewed for this paper knew what proportion of their project directors were women. FIPSE reported that approximately one-third of the Fund's project directors were women,[27] and also indicated that in the monitoring process, it regularly reviews the staffing patterns of grantees and contractors. The Dissemination and Resources Group in NIE reported that women constituted two of seven project directors in one area (in which contracts totaled over $1 million) and five of twenty-four in another (in which contracts averaged $100,000).[28]

CRITERIA ON STAFFING

Both the Women's Research Staff in NIE and the Women's Program Staff in OE include in their Requests for Proposals award criteria giving weight to balanced staffing patterns. A section on "Organization/Personnel" in one Women's Research Staff RFP uses the following language:

> COMPLIANCE WITH NCER'S RESOLUTION ON WOMEN AND MINORITIES:
>
> The National Council on Educational Research (NCER), NIE's policy-making board, has adopted a resolution stating that:
>
> It shall be the policy of the National Institute of Education to increase the participation of minority persons and women in the research and development effort of the nation through ensuring that qualified minority firms and individuals and qualified women are given informed opportunity to participate in NIE programs, and through efforts to increase the numbers, qualifications and performance of minority firms and individuals, and women engaged in education R&D.[29]
>
> Offerors must indicate how they will comply with the intent of this resolution.

In the weighting, this item is grouped with four others related to staffing, and the group of items is allocated 20 points of a total of 100. The Women's Research Staff had wanted to be even more explicit - defining the intent of the NCER resolution in terms of staffing balance - but considerations of legality led to the more general statement.

CAREER EDUCATION

The 1972 Task Force Report focused heavily on sex bias in career education, making several specific recommendations on this topic. Though some units with responsibilities in this area have made significant efforts to foster equity for girls and women, OE's Office of Career Education - despite a clear charge in the legislative mandate that it address sex stereotyping - has funded only a handful of projects specifically targeted on this problem. When questioned about this in an interview, the

head of the Career Education Office replied that concern with sex stereotyping had been "mainstreamed" into all the Office's projects. And, in fact, some efforts to inform project directors about Title IX and sex bias issues -- including meetings and mailings -- have been made. One very important step has not been taken, however: Program regulations have not been altered to require that all projects address the problem of sex stereotyping. As a result, "mainstreaming" is left to chance, and available evidence does not support the contention that the reduction of sex stereotyping has been an objective of all projects. Of the eighty-one projects funded in fiscal 1975, only three were specifically targeted on sex bias. Of the twenty final reports of other projects available for review, only seven so much as mentioned any attempt to eliminate sex stereotyping in career education, and only one of these seven discussed the issue at any length.

In fiscal 1976, 118 projects were funded for a total of $10.1 million. A review[30] of the abstracts of seventy-one of these projects* revealed that only 2.7 percent of FY 76 career education funds were spent on projects related directly to reducing sex stereotyping. Of the fourteen projects funded under the special category of "Projects for Such Special Segments of the Population as the Handicapped, Gifted and Talented, Minority or Low Income Youth and to Reduce Sex Stereotyping in Career Choice," only <u>two</u> focused on reducing sex stereotyping. Of the sixty-nine projects in other categories, only eleven addressed this issue in any way -- most with vague, one-line statements -- and only one focused on the problem.

The Office of Career Education's lack of concern with the issue is indicated by *Career Education, How to Do It: Creative Approaches for Local Practitioners*, a book developed by the Office in 1974 and still widely used as a guidebook of suggestions for local career educators. Of the over 200 career education programs described, only one focuses on reducing sex stereotyping, and only one other even mentions it.

USE OF ADVISORY GROUPS

One device used by NIE's Education and Work Group to assure social fairness in a major project was the requirement of an advisory group that included women and representatives of minority groups among its members. In 1976, the Group contracted with the University of Southern California to develop a series of children's television shows about careers. One of the project objectives was to help counteract the limiting effects that sex-role stereotypes have on career choices. In addition to attending to the way bidders addressed this problem in their proposals, the Federal staff required that the advisory group be actively involved in reviewing the plans and materials for the show as they are developed to make sure that the contractor remains fully sensitive to social fairness issues.

ACCESS OF WOMEN TO EDUCATION RESEARCH

In April 1976, the head of NIE's Women's Research Staff suggested that NIE sponsor seminars or workshops for women and minorities on how to write proposals. She said: "It has been my experience as a reviewer for other major research agencies and foundations, as well as within NIE, that many of the best, most creative and important ideas for research are proposed by women, minorities, and young investigators; however, oftentimes these ideas are presented in a proposal format whose lack of sophistication and proposal-writing expertise precludes the possibility of funding."[31]

Subsequently an NIE task force - established to plan a technical assistance effort that would be supported by the Dissemination and Resources Group - decided that the effort should address several aspects of the problem of improving the access of women and minorities to high-level professional positions in education research and development. A member of the task force pointed out that beyond any lack of sophistication, women and minorities have special

Abstracts were not available for the forty-seven state planning projects.

problems in gaining recognition for their work: "I fear that very often women and minorities participate in collaborative publications with senior investigators and often do most of the work, but then are given *no credit* for *authorship*. Likewise, women and minorities assume major project responsibilities, but are frequently *not allowed* to become the *principal investigator*."[32]

Ultimately, the Dissemination and Resources Group initiated several actions to alleviate the problem. Approximately $950,000 has been allocated from fiscal 1977 funds for a planning and pilot program, and a $3 million allocation for this purpose is planned for fiscal 1978, in addition to what will be spent on similar activities by Federally supported education labs and centers. A number of papers are being prepared, and one -- "Participation of Women and Minority Subgroups in Research-related Activities in the Field of Education," by John Egermeier -- is now in draft form. On March 1, 1977, the labs and centers were mailed an RFP entitled "Experimental Project Grants for Increasing Participation of Women and Minorities in Education R&D Centers."[33]

WOMEN'S FIRMS

Firms owned and managed by women constitute an extremely small proportion of those receiving Education Division funds. The Federal government does not even know how many such firms exist. A survey of women-owned firms begun in late 1976 by the Small Business Administration has not yet been completed. The only extant study is a 1975 report of the United States Commission on Civil Rights entitled *Minorities and Women as Government Contractors*, which was based largely on 1972 data. The report focused on minorities and on the special government program (known as the "8a" program) for businesses owned by disadvantaged people. Of the total 1,780 firms allowed to participate in the 8a program, only thirty-eight are female-owned. Thirty-seven of the owners are minority women and one is a white woman with a physical disability. (Despite widespread discrimination against women in the granting of credit and in the business world generally, the Small Business Administration does not recognize women business owners as eligible for 8a status unless they fit another category such as minority or handicapped.) The Commission survey showed that both minorities and women believed that there was widespread hostility toward and mistrust of minority- and female-owned firms, and that 44.8 percent felt that Federal contracting officers impose more stringent criteria on minority- and female-owned businesses during the bidding and selection process than on other businesses.[34]

In general, female-owned firms are small, have little capital, and cannot compete with the Establishment. They depend on small contracts (under $100,000, usually between $10,000-$50,000) and on subcontracts with established firms.

Federal contracting officers revealed that, of the 14,092 contracting specialists, 26.2 percent were women and 3.9 percent were minority women -- almost all of them in the lowest grade levels. Of contracting specialists in the upper grades (GS 13-15), 4.4 percent were women and 0.3 percent were minority women.[35]

REVIEW PANELS

Even when women submit outstanding proposals for grants or contracts, their efforts can go for nought if the reveiwers manifest sex bias, as is sometimes the case. The following example was provided by one respondent to the Council's questionnaire:

> I was a member of an all-male panel convened for purposes of selecting a contractor. The contract called for an analysis of Federal programs in certain areas, to include agency purposes which addressed minority problems, budget allocations for minority programs, and examples of such programs. The candidates consisted of four consulting firms which were headed by minority males, and one which was headed by a minority female. After much discussion on the merits of past work of each of the

candidates (who were not present), it was decided to eliminate two of the male firms, citing their lack of sustained effort according to evidence and the documents submitted by the candidates. In discussing the rest of the candidates, mention primarily focused on the two male-headed firms. When I mentioned that we ought to also consider the merits of the female-headed firm, one of the panelists declared that for the type of work being requested, a female-headed firm would encounter difficulty in eliciting responses from agencies, due to *normal* resistance to female consultants.

I countered by pointing out that the woman in question was known to have done good professional work in the past, that the panel would be available to provide whatever post-award assistance in reaching agencies was necessary, and that anyway, we should not be influenced ourselves by a type of bias which we were attempting to uncover by way of a contract.

She was ultimately awarded the contract.

When asked to indicate where bias was most likely to occur in discretionary programs, eight of thirty-five respondents to the questionnaire checked "processes used to choose projects (e.g., review panel composition)," the second most common choice after "staffing pattern." Many respondents stated, however, that their programs made efforts to see that review panels were balanced in terms of sex and ethnicity.

DISCRETIONARY FELLOWSHIP PROGRAMS

Many OE programs, such as bilingual education and vocational education, contain a training component to prepare professionals and paraprofessionals in a given field. By and large, these programs have made strong efforts to insure that women are represented at all levels.

In addition, OE funds a number of less subject-specific fellowship programs to support advanced studies, such as the Fulbright-Hayes program. Female representation in these programs varies widely, as Table 1* indicates.

THE ISSUE OF CULTURAL CONFLICTS

In several interviews the question of possible conflict between equal rights for women and the values of traditional cultures was raised. Personnel in both the Office of Bilingual Education and the Office of Indian Education were sensitive to the issue but emphasized that it differed from one subgroup to another.

The specific conflict faced by the Office of Indian Education is that part of its mandate is to restore pride in traditional Indian cultures -- cultures that, in some cases, have rigid sex roles and assign inferior status to women.

ADDITIONAL STEPS

A variety of additional steps can be taken to overcome sex bias and sex stereotyping in educational programs. The primary requisite is that management be committed to this goal. Appendix F lists some sample objectives set by programs within the Bureau of Occupational and Adult Education for fiscal 1977. Included are regional office objectives related to such activities as collecting data, analyzing problems, amending currently used monitoring instruments, talking about Title IX at conferences, providing technical assistance in the preparation of sex-fair publications, and gathering and disseminating information about exemplary practices. Sample objectives for adult education include the development of written criteria for sex-bias-free competency-based instruction and the training of regional, state, and local personnel in their use.

CONCLUSIONS AND RECOMMENDATIONS

Federal officials in charge of discretionary programs have available to them an even wider array of tools for promoting greater

**Table 1 covers only a few of these programs. Information on student aid for undergraduates can be found in Chapter IV.*

TABLE 1

FEMALE RECIPIENTS OF FELLOWSHIPS

Program	Year	# Applicants	# Female Applicants	% Female Applicants	# Recipients	# Female Recipients	% Female Recipients	% Women on Selection Committee
NDEA-Title IV Graduate Fellowships	1968-69				15,328	4,292	28.0	
	1969-70				12,233	3,303	27.0	
	1970-71				8,603	2,151	25.0	
	1971-72				8,345	2,170	26.0	
	1972-73				4,650	1,209	26.0	
	1973-74							
	1974-75							
Higher Education Personnel Fellowship Program	1968-69				415	178	42.9	
	1969-70				960	470	49.0	
	1970-71				903	388	43.0	
	1971-72				912	392	43.0	
	1972-73							
	1973-74							
	1974-75							
Fulbright-Hayes Exchange Program for Elementary and Secondary Teachers	1968-69	1,935			293	136	46.1	
	1969-70	1,798			243	102	42.0	
	1970-71	1,890			292	111	38.0	34.0
	1971-72	1,987	919	46.3	269	111	41.3	
	1972-73	2,233	990	44.3	255	104	40.8	
	1973-74							
	1974-75							
Fulbright-Hayes Graduate Study Program	1968-69	4,400	2100	47.7	723	290	40.1	
	1969-70	2,030	980	48.3	273	104	30.8	
	1970-71	1,940	800	41.2	286	103	36.0	15.0
	1971-72	2,150	950	44.2	300	113	37.7	
	1972-73	2,980	1320	44.3				
	1973-74							
	1974-75							
Advanced Fulbright-Hayes Program (doctoral or postdoctoral)	1968-69	496			152	7	4.6	
	1969-70	803			56	3	5.4	
	1970-71	323			72	1	1.4	12.1
	1971-72	395			112	6	5.4	
	1972-73	658			90	7	7.8	
	1973-74				195	38	7.7	
	1974-75				504	36	7.1	

Sources: Judith Nies, Women and Fellowships, 1976 (Washington: Women's Equity Action League, 1976), p. 26; Cynthia L. Attwood, Women in Fellowships, (Washington: Association of American Colleges, November 1972), pp. 24-37.

equity for girls and women than do those in charge of formula grant programs. A variety of exemplary models -- discussed above -- have been pioneered in programs whose personnel are deeply interested in women's rights and should be replicated throughout the Education Division. The Council makes the following recommendations about ways in which discretionary programs, or programs with discretionary aspects, can help increase opportunities for girls and women in education.

6. Concern with sex fairness should be made a priority of the Education Division and should be reflected in all programs.
   a. Grant regulations and guidelines and requests for proposals for programs and projects affecting the delivery of services to students should include award criteria that reflect a concern with issues of sex bias and sex stereotyping. At least 5 points out of 100 should be allocated to these criteria, and a minimum of 2 points should be required if a proposal is to be considered for funding at all.
   b. Grant regulations and guidelines and requests for proposals for programs and projects related to training educators should include award criteria that reflect a concern both with making outreach efforts to recruit women and minorities and with making educators more aware of problems of sex bias and sex stereotyping and of strategies to overcome these problems. At least 10 points out of 100 should be allocated to these criteria, and a minimum of 4 points should be required if a proposal is to be considered for funding at all.
   c. Incentives such as special awards should be given each year to project officers who have been particularly effective in using Federal funds to achieve sex-fair education.

7. The Council repeats and expands the 1972 recommendation that at least 10 percent of the appropriations for each and every discretionary program be spent on projects specifically targeted to making a special contribution to equity for women.

8. The Office of Career Education, and any future career education program authorized by new legislation, should have as a priority overcoming sex bias and sex stereotyping.
   a. All grant regulations and guidelines and requests for proposals should require that the grantee or contractor explain in detail how the project will contribute to overcoming sex bias and sex stereotyping. Thirty out of 100 points should be allocated to these criteria.
   b. The Council repeats the 1972 recommendation that guidelines require all model and exemplary programs in career education and training to report their success in including students of both sexes in all education activities.

9. The Council repeats the concern of the 1972 Task Force with the staffing patterns of grantees and contractors and recommends that all bidders be required to submit information on title, salary, and responsibilities of top project staff by sex and that at least 5 points out of 100 be granted for staffing patterns which demonstrate balance.

10. The Council repeats and expands the 1972 recommendation that the Education Division encourage grant and contract applications from women.
   a. Women's groups should be added to appropriate mailing lists so that they will receive application notification and guidelines.
   b. The planned National Institute of Education pilot project for training women and minority researchers should proceed as quickly as possible. If successful, it should be repeated and expanded.
   c. The Education Division should track its own record in funding female-owned firms and should pub-

lish an annual report listing all grants and contracts to female-owned firms and stating the percentage -- in terms of both numbers and dollar volume -- that these constituted of each unit's total outlay for grants and contracts.

d. The Division should recommend to the Administration that female-owned firms be eligible for all the services, programs, and privileges that the Small Business Administration grants minority-owned firms.

11. The membership of all Education Division review panels should be balanced* with respect to sex and race/national origin and should include people knowledgeable about problems of sex bias and sex stereotyping.

12. The membership of all Education Division project advisory committees should be balanced with respect to sex and race/national origin and should include people knowledgeable about problems of sex bias and sex stereotyping.

13. Because the resources available for projects targeted on sex fairness are limited, the offices making grants and contracts in this area should coordinate their efforts. In particular, the Women's Educational Equity Act Program, the Women's Research Staff of NIE, and the Equal Educational Opportunity Office (which makes grants under Title IV) should strive for greater coordination.

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*"Balance" is defined as striving toward a goal of 50 percent women, with any deviation from that goal to be justified by the project administrators.

IV.
What efforts are made to assure sex fairness in student financial assistance programs?

As mentioned in Chapter I, we have chosen to treat OE's major student aid programs separately from other formula grant programs because of their unique characteristics. The size of these programs -- $3 billion in fiscal 1976, or 36.9 percent of OE's budget -- is determined by the number of eligible applicants and by the ceilings imposed on individual awards by Congress.

Any rigorous evaluation of sex fairness in student aid would require a complete picture of the universe of need and the universe of aid available. Within such a framework, one could then compare the sexes with respect to the contribution that each program makes toward meeting the defined need of each sex. Unfortunately, such data are not available.

A number of analyses have been done of the information available, however, and their findings are summarized below.

ANALYSIS OF AID FOR WOMEN

Although girls make better grades in high school than do boys, proportionately fewer women go on to college: approximately two in five women, compared with one in two men.[36] Once in college, women are more likely than men to drop out: Fewer than half of women college students complete their program, compared with 55 percent of men.[37]

In 1974, 42.5 percent of all full-time college students were women. Women tended to be concentrated in lower-cost institutions: They constituted 46.1 percent of the students enrolled in public four- year colleges but only 36.5 percent of those enrolled in private four-year colleges.[38] Even though the college costs of women averaged $175 less per year in 1969-70 than did the average college costs of men, the parents of female students spent an average of $200 more per year on college costs. The reasons for this discrepancy are: (1) women earned $211 per capita less than men in term-time jobs; (2) women received $34 each less in grants than men; and (3) women were only half as likely as men to obtain loans.[39]

Because women traditionally have been limited to low-paying, female-typed jobs, they are less able than men to pay for college with term-time and summer earnings. Men earned on the average 58.2 percent of their college costs, while women earned only 37.8 percent.[40] Minority men also suffer in this regard. The director of OE's student aid programs estimated that the typical minority male student earns $300-$400 less per summer of work than does his white male counterpart.[41]

A wide variety of financial aid programs are available to help postsecondary students, including privately endowed grants, state assistance programs, athletic scholarships, Federal aid programs, Federal loan programs, and federally insured private loans. Though the Federal programs keep data by sex and by race/national origin* on aid recipients, they have no such

*Data are available by sex or by race/national origin, but not by-sex-by-race/

data on those who apply for aid, nor do they keep records by sex on the amount of aid provided.

One program officer explained in an interview that dollar amounts are not recorded by sex because no one is interested in that information so that there is no pressure to keep such records. He also said that "in the future, we'll just cheat. We'll simply take the average amount for all students and multiply it by the number of females."

The available data show that women received slightly more than half of the awards, by number, in each of OE's programs (Table 2).

Although more women than men participate in at least one program, more men than women participate in multiple programs. For example, Table 3 shows men's and women's participation in three programs - National Direct Student Loan, Supplementary Educational Opportunity Grant, and College Work-Study - in fiscal 1975. The first column is the unduplicated count: that is, the number of students who appear at least once, and are not counted again if they also participate in a second program. The next three columns show men's and women's participation in each program. Adding across the three programs one gets the total count (the figure in the last column). In this column, the men outnumber the women.

Unless one knows the amount of aid disbursed, it is not clear whether this means that men receive more total aid than women, but that possibility certainly arises.

Another aspect of aid programs of special interest to women are the restrictions on aid to part-time students. The law authorizing student aid programs states that students attending *half-time or more* are eligible. For BEOG, SEOG, NDSL, and CWS, the HEW regulations define half-time as six semester hours or more per semester. For SSIG, the definition of half-time is determined by the states. For GSL, the definition is determined by the institution. Students who attend less than half-time may not receive aid from these programs.

CONCLUSIONS AND RECOMMENDATIONS

In the absence of necessary data on the total universe of need and the universe of aid available to fill that need, the sex fairness of OE's student aid programs cannot be adequately assessed. The available evidence suggests, however, that women may be financially disadvantaged in pursuing postsecondary education. In light of these considerations, the Council makes the following recommendations:

14. The HEW unit responsible for student aid should sponsor a comprehensive analysis of the need for, and availability of, student aid. Such a

TABLE 3

PARTICIPANTS IN THREE FEDERAL STUDENT AID PROGRAMS (FY 1975)

Sex	Unduplicated Number of Aid Recipients	NDSL	SEOG	CWS	TOTAL
Men	642,200	387,090	192,660	281,580	861,330
Women	657,800	302,910	197,340	288,420	788,670

Source: Division of Student Financial Aid, Office of Education

national origin. Thus, one cannot obtain data on, for example, minority women as a group.

TABLE 2
PROPORTION OF FEMALE STUDENT AID RECIPIENTS, BY OFFICE OF EDUCATION PROGRAM, BY TYPE OF INSTITUTION

	Total OE AID	BEOG*	SEOG*	SSIG*	CWS*	NDSL*	GSL*
All institutions	51.0	54.5	54.1	49.6	54.0	49.6	45.8
All public institutions	52.3	55.2	55.2		55.0	51.1	47.1
All private institutions	48.7	52.4	52.0		52.3	47.6	44.3
All public universities	49.3	50.8	52.1		52.5	48.2	44.1
All private universities	42.6	44.8	46.8		47.2	39.7	40.7
All public 4-yr. colleges	50.6	54.4	54.1		54.8	52.1	49.9
All private 4-yr. colleges	49.9	54.7	52.5		53.7	49.3	46.3
All public 2-yr. colleges	56.5	57.0	59.4		57.3	55.5	47.0
All private 2-yr. colleges	50.0	47.9	57.8		46.2	55.0	39.3

Source: Frank J. Atelsek and Irene L. Gomberg, Student Assistance: Participants and Programs, 1974-75, Higher Education Panel Reports, No. 27, (Washington: American Council on Education), December 1975.

* *For definitions and program descriptions, see pp. 3 and 4.*

study should look at the following factors:

a. financial need in the total population of students and of potential students, by sex, race/national origin, and age;
b. the total universe of available support, including family contribution, Federal and state grants, private grants, work-study, and public and private loans;
c. the distribution of each of the types of aid, with amounts, to students by sex, race/national origin, and age/
d. a comparison of the distribution pattern with the need pattern, by sex, race/national origin, and age; and
e. a comparison of the characteristics of the applicants who received each type of aid with the characteristics of the applicants who were rejected.

15. Eligibility for aid should be extended to part-time students who are enrolled less than half-time.

Footnotes

[1]U.S. Office of Management and Budget, *The Budget of the United States Government, Fiscal Year 1978* (Washington: U.S. Government Printing Office, January 1977), p. 288.

[2]Ibid., p. 144.

[3]Analyses based on data provided by Nancy Rhett, Office of Education.

[4]Ibid.

[5]Women's Program Staff, Office of Education, 400 Maryland Ave., S.W., Washington, D.C. 20202.

[6]National Advisory Council on Women's Educational Programs, *Process Evaluation of the Women's Educational Equity Act Program* (Washington: NACWEP, 1977).

[7]HEW press release, March 8, 1977.

[8]Descriptions of the programs are taken from Frank J. Atelsek and Irene L. Gomberg, *Student Assistance: Participants and Programs, 1974-75*, Higher Education Panel Reports, No. 27 (Washington: American Council on Education, December 1975), pp. 1-2.

[9]JoAnn Steiger and Eleanor Szanton, *Vocational Preparation of Women* (Washington: Secretary's Advisory Committee on the Rights and Responsibilities of Women, USDHEW, 1976).

[10]The statistics in this paragraph are from an OE analysis that can be found in Appendix C.

[11]Interview.

[12]Patricia Gillespie and Albert Fink, "The Influence of Sexism on the Education of Handicapped Children," *Exceptional Children*, Vol. 41, No. 3 (November 1974), pp. 155-162.

[13]Patricia Thomas Cegelka, "Sex Role Stereotyping in Special Education: A Look at Secondary Work Study Programs," *Exceptional Children*, Vol. 42, No. 6 (March 1976), pp. 323-328.

[14]Interview.

[15]Unpublished memorandum to the Assistant Secretary for Education, March 17, 1977.

[16]HEW press release, March 17, 1974.

[17]Speech before the National Dissemination Workshop for Title IX, sponsored by the Council of Chief State School Officers, Alexandria, Virginia, March 24, 1977.

[18]Mary Ellen Verheyden-Hilliard. *Title IX of the Education Amendments of 1972: A Progress Assessment Memorandum* (Washington: Secretary's Advisory Committee on the Rights and Responsibilities of Women, U.S. Department of Health, Education, and Welfare, January 1977).

[19]For a description of programs funded in FY 1976, write to the Women's Program Staff, Office of Education, 400 Maryland Ave., S.W., Washington, D.C. 20202.

[20]For information on projects funded, write to Women's Research Staff, Education Equity Group, National Institute of Education, 19th and M Sts., N.W., Washington, D.C. 20208.

[21]For a description of FIPSE's philosophy in dealing with the special problems of girls and women, and for a list of projects funded, write for *Projects/Women: Reports from the Fund*. For a complete list of all FIPSE projects, write for *Resources for Change: A Guide to Projects 1976-77*. Fund for the Improvement of Postsecondary Education, 400 Maryland Ave., S.W., Washington, D.C. 20202.

[22]For an analysis of funds spent on special projects to meet the needs of girls and women, and for descriptions of the projects, write to Education and Work Group, National Institute of Education, 19th & M Sts., N.W., Washington, D.C. 20208.

[23]*Federal Register*; Vol. 41, No. 37 (February 24, 1976), pp. 8040-8044.

[24]Ibid., p. 8042.

[25]Ibid., p. 8043.

[26]Carter H. Collins, *NIE Major Contractors (As of 3/1/76) Workforce Compilation and Analysis* (Washington: Office of Planning, Budget, and Program Analysis; Office of Education; U.S. Department of Health, Education, and Welfare, December 1976; revised January 18, 1977).

[27]Questionnaire.

[28]Questionnaire.

[29]RFP published April 1977, titled "The Achievement Styles Project."

[30]*Profiles of Career Education Projects*, prepared by Pacific Consultants for the Office of Career Education, Office of Education, U.S. Department of Health, Education, and Welfare, December 1976).

[31]Memorandum from Jean Lipman-Blumen, Head, Women's Research Staff, to Harold Hodgkinson, Director, NIE, April 26, 1976.

[32]Memorandum from Susan Klein to Senta Raizen and Members of the Task Force to Increase the Participation of Women and Minorities in Education KPU Functions, July 29, 1976.

[33]Questionnaire.

[34]U.S. Commission for Civil Rights, *Minorities and Women as Government Contractors*, 1975.

[35]Ibid., p. 22.

[36]Joseph Froomkin, *Study of the Advantages and Disadvantages of Student Loans to Women*, Contract No. HEW-OS-74-255 (Washington: U.S. Department of Health, Education, and Welfare, December 1974), p. iii.

[37]Ibid., p. iv.

[38]Statistics from the 1974 Higher Education General Information Survey, National Center for Education Statistics.

[39]Froomkin, 1974, citing figures from Elizabeth W. Haven and Dwight H. Horch, *How Students Finance Their Education: A National Survey of the Educational Interest, Aspirations and Finances of College Sophomores in 1969-70* (New York: College Entrance Examination Board, 1972).

[40]Ibid., p. 42.

[41]Interview.

Appendix A

Federal Funds

Guide to OE-Administered Programs, Fiscal Year 1977

The federal government is a major source of financial support and technical assistance to the nation's schools and colleges, chiefly through the U.S. Office of Education (OE). As a major component of the Education Division of the U.S. Department of Health, Education, and Welfare, OE administers programs covering virtually every level and aspect of education. These programs and the fiscal year 1977 funds appropriated by Congress in support of them are listed on the following pages.

For easy reference, the programs are presented in categories or groupings that indicate whether they serve individuals or institutions and the nature of their support, for example, research or construction. Since the several phases of one program or activity may serve more than one category, a given program may be listed more than once.

Fiscal year 1977 funds which have been appropriated to OE currently total almost $5.6 billion. This amount excludes funds for a number of other programs which were not considered by the congressional appropriations committees pending their legislative reauthorization. Such programs are presently operating at the fiscal year 1976 level under a continuing resolution, pending enactment of appropriations. These have been identified by a footnote in the following listing. The OE total also excludes programs administered by the Assistant Secretary for Education and the National Institute of Education, the other components of the HEW Education Division.

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compiled by **CAROL JOFFE**
OE Office of Public Affairs staff

TYPE OF ASSISTANCE	AUTHORIZING LEGISLATION	PURPOSE	APPROPRIATION (dollars)	WHO MAY APPLY	WHERE TO APPLY
GROUP I: TO INSTITUTIONS, AGENCIES, AND ORGANIZATIONS					
PART A—For Elementary and Secondary Education Programs					
1 Bilingual education basic programs (OMB Cat. No. 13.403)[1]	Elementary and Secondary Education Act, Title VII	To develop and operate programs for children ages 3-18 with limited English speaking ability	85,725,000 (includes inservice training component)	Local education agencies or institutions of higher education (they may apply jointly)	OE Application Control Center (information from OE Office of Bilingual Education)
2 Bilingual education support services (OMB Cat. No. 13.403)[2]	Elementary and Secondary Education Act, Title VII	To operate regional centers providing assistance to bilingual education teachers in local districts (training resource centers); develop bilingual curriculum materials (material development centers); or evaluating and printing such materials (assessment dissemination centers)	12,000,000	Local educational agencies or institutions of higher education (they may apply jointly); state education agencies may apply for training resource centers	OE Application Control Center (information from OE Office of Bilingual Education)
3 Community schools (OMB Cat. No. 13.563)	Education Amendments of 1974, Special Projects Act, Sec. 405	To assist state and local education agencies in establishing community schools, to train personnel to plan and operate community education programs	3,553,000	State and local education agencies, higher education institutions	OE Bureau of Occupational and Adult Education
4 Education and the Arts (OMB Cat. No. 13.566)	Education Amendments of 1974, Special Projects Act, Sec. 409	To encourage the establishment of arts education programs at elementary and secondary levels	1,750,000	State and local education agencies	OE Arts and Humanities Staff, Office of the Commissioner
5 Educational innovation and support (OMB Cat. No. 13.571)	Elementary and Secondary Education Act, Title IV-C	To improve leadership resources of state and local education agencies, to support innovative and exemplary projects, nutrition and health service and dropout prevention	184,521,852[2]	State and local education agencies	OE Division of State Educational Assistance Programs
6 Ethnic Heritage Studies (OMB Cat. No. 13.549)	Elementary and Secondary Education Act, Title IX	To develop intercultural understanding among individuals living in a pluralistic society, to promote mutual understanding among various U.S. ethnic groups	2,300,000	Public or private nonprofit education agencies, institutions, or organizations	OE Application Control Center (information from OE Ethnic Heritage Studies Branch)
7 Follow Through (OMB Cat. No. 13.433)	Community Services Act (P.L. 93-644), Title V	To extend into primary grades educational gains made by deprived children in Head Start or similar preschool programs	59,000,000	Local education or other agencies nominated by state education agencies in accordance with OE criteria	OE Application Control Center (information from OE Division of Follow Through)
8 Incentive grants (OMB Cat. No. 13.512)	Elementary and Secondary Education Act, Title I, Part B	To encourage greater state and local expenditures for education	24,769,000	State education agencies that exceed the national effort index	OE Division of Education for the Disadvantaged
9 Indian education (OMB Cat. No. 13.534)	Indian Education Act (P.L. 92-318), Title IV, Part A	To provide supplemental programs meeting special educational needs of Indian children enrolled in public schools, grades K-12	22,727,273[3]	Local education agencies	OE Application Control Center (information from OE Office of Indian Education)
10 Indian education (OMB Cat. No. 13.551)	Indian Education Act (P.L. 92-318), Title IV, Part A (10 percent set aside)	To provide special elementary and secondary school programs meeting the special educational needs of Indian students	2,272,727	Nonlocal education agency schools on or near reservations, LEAs less than three years having a substantial Indian enrollment	OE Application Control Center (information from OE Office of Indian Education)
11 Indian education—special programs and projects (OMB Cat. No. 13.535)	Indian Education Act (P.L. 92-318), Title IV, Part B	To provide exemplary and demonstration programs for improving educational opportunities for Indian children	13,080,000	Indian tribes, institutions and organizations, SEAs, LEAs, federally supported elementary and secondary schools for Indian children, higher education institutions	OE Application Control Center (information from OE Office of Indian Education)
12 Metric education (OMB Cat. No. 13.561)	Education Amendments of 1974, Special Projects Act, Sec. 403	To encourage education agencies to prepare students for the metric system of measurement	2,090,000	State and local education agencies, institutions of higher education, public and private nonprofit agencies, organizations, and institutions	OE Bureau of Occupational and Adult Education
13 Packaging and dissemination (OMB Cat. No. 13.553*)	Education Amendments of 1974, Sec. 402, Special Projects Act and the General Education Provisions Act, Sec. 422(a)	To promote wide dissemination and effective adoption of exemplary education programs identified by the OE/NIE Joint Dissemination Review Panel	10,000,000	State and local education agencies, higher education institutions, and other public and private agencies	*Packaging*—Deputy Commissioner, Office of Planning. *Dissemination* (including the National Diffusion Network)—Deputy Commissioner, Bureau of Elementary and Secondary Education

TYPE OF ASSISTANCE	AUTHORIZING LEGISLATION	PURPOSE	APPROPRIATION (dollars)	WHO MAY APPLY	WHERE TO APPLY
14 Programs for children in state institutions for the neglected and delinquent (OMB Cat. No. 13.431)	Elementary and Secondary Education Act, Title I, Sec. 123	To improve the education of delinquent and neglected children in state institutions	28,841,151	Eligible state agencies	State education agencies
15 Programs for disadvantaged children (OMB Cat. No. 13.428)	Elementary and Secondary Education Act, Title I	To meet the educational needs of deprived children	1,721,361,155	Local school districts	State education agencies
16 Programs for migratory children (OMB Cat. No. 13.429)	Elementary and Secondary Education Act, Title I, Sec. 122	To meet the educational needs of children of migrant farm workers	130,909,832	Local school districts	State Education agencies
17 Special assistance to refugees from Laos, Cambodia and Vietnam (OMB Cat. No. 13.769*)	Indochinese Refugee Children Assistance Act, 1976 (PL. 94-405)	To assist refugees from Laos, Cambodia and Vietnam	(operated on transfer funds)	State or local education agencies	Local school districts apply to state education agencies. State education agencies apply to OE Refugee Task Force
18 State administration of ESEA Title I programs (OMB Cat. No. 13.430)	Elementary and Secondary Education Act, Title I	To strengthen administration of ESEA Title I	21,185,411	State education agencies	OE Division of Education for the Disadvantaged
19 Right to Read (OMB Cat. No. 13.533)	Education Amendments of 1974, National Reading Improvement Program, Title VII (PL. 93-380, as amended by PL. 94-194)	To stimulate institutions, government agencies, and private organizations to improve and expand reading related activities for children, youths, and adults	26,000,000	State and local education agencies, nonprofit educational or child care institutions, higher education institutions, and other public and private nonprofit agencies and individuals	OE Application Control Center (information from OE Right to Read Office)
20 School maintenance and operation (OMB Cat. No. 13.478)	School Assistance in Federally Affected Areas (PL. 81-874)	To aid school districts on which federal activities or disasters have placed a financial burden	768,000,000	Local school districts	OE Division of School Assistance in Federally Affected Areas
21 State equalization grants (OMB Cat. No. 13.572)	Education Amendments of 1974, Title VIII, Part D, Sec. 842	To reimburse states for costs incurred in the development or administration of a plan for equalization of state and local school finances with primary purpose to achieve equality of opportunity for all children	10,500,000	State education agencies other state agencies designated by law	OE School Finance Unit, Bureau of School Systems
22 Women's educational equity (OMB Cat. No. 13.565)	Education Amendments of 1974, Special Projects Act, Sec. 408	To support development and implementation of capacity-building programs contributing to women's educational equity and having a possible national impact	7,270,000	Public agencies, private nonprofit organizations, and individuals	OE Women's Program Staff, Office of the U.S. Commissioner of Education
PART B—For Strengthening Organizational Resources					
23 Alcohol and drug abuse education programs (OMB Cat. No. 13.420)	Alcohol and Drug Abuse Education Act of 1974 (PL. 93-422)	To organize and train alcohol and drug education leadership teams at state and local levels, to develop programs and leadership to combat causes of alcohol and drug abuse	2,000,000	Higher education institutions, state and local education agencies, public and private education or community organizations	OE Alcohol and Drug Education Program
24 Bilingual education technical assistance coordination (OMB Cat. No. 13.403)	Elementary and Secondary Education Act, Title VII	To provide technical assistance to local education agencies operating Title VII Basic Programs (see I.1) and to coordinate bilingual programs within the state	3,900,000	Qualifying state education agencies	OE Application Control Center (information from OE Office of Bilingual Education)
25 Education broadcasting facilities (OMB Cat. No. 13.413)	Public Broadcasting Act of 1967	To aid in the acquisition and installation of broadcast equipment for educational radio and TV	15,000,000	Nonprofit agencies, public colleges, state broadcast agencies, and education agencies	OE Application Control Center (information from OE Educational Broadcasting Facilities Program)
26 Educational television programing (OMB Cat. No. 13.541*)	Education Amendments of 1974, Sec. 402, Special Projects Act	To fund development and dissemination of educational television programs	7,000,000	Nonprofit and profit making agencies, state and local education agencies, colleges, universities, institutions, and organizations	OE Application Control Center (information from OE Division of Educational Technology)
27 Interlibrary cooperation (OMB Cat. No. 13.465)	Library Services and Construction Act, Title III	To establish and operate cooperative networks of libraries	3,337,000	State library administrative agencies	OE Regional Offices, Library Services Program Officers
28 Library and learning resources (OMB Cat. No. 13.570)	Elementary and Secondary Education Act, Title IV-B	To help provide school library resources, text books, and other instructional materials, instructional equipment and minor remodeling, testing, counseling, and guidance services in elementary and secondary schools	147,330,000[2]	State education agencies	OE Office of Libraries and Learning Resources
29 Library services (OMB Cat. No. 13.464)	Library Services and Construction Act, Title I	To extend and improve public library services, institutional library services, and library services to populations unserved or inadequately served	56,900,000	State library administrative agencies	OE Regional Offices, Library Services Program Officers
30 Projects in environmental education (OMB Cat. No. 13.522)	Environmental Education Act of 1970 (PL. 91-516)	To develop environmental and ecological awareness and problem-solving skills through education programs conducted by formal and nonformal educational organizations and institutions	3,500,000	Higher education institutions, local and state education agencies, regional educational research organizations, and other public and private organizations (including libraries and museums)	OE Application Control Center (information from OE Office of Environmental Education)
31 Teacher Corps (OMB Cat. No. 13.489)	Higher Education Act, Title V	To strengthen educational opportunities available to children in areas having concentrations of low-income families, to encourage colleges and universities to broaden their teacher preparation programs, and to encourage higher education institutions and local education agencies to improve training and retraining programs for teachers and other education personnel	37,500,000[4]	Higher education institutions, local education agencies, and state education agencies	OE Teacher Corps Office

TYPE OF ASSISTANCE	AUTHORIZING LEGISLATION	PURPOSE	APPROPRIATION (dollars)	WHO MAY APPLY	WHERE TO APPLY
PART C—For Postsecondary Education Programs					
32 Basic institutional development (OMB Cat. No. 13.454)	Higher Education Act Title III	To provide partial support for cooperative arrangement between developing and established institutions	52,000,000[4] (includes 44)	Accredited colleges and universities in existence at least five years	OE Division of Institutional Development
33 Advanced institutional development (OMB Cat. No. 13.454)	Higher Education Act Title III	To assist selected developing institutions enter the mainstream of higher education	58,000,000[4]	Developing institutions with demonstrated progress	OE Division of Institutional Development
34 Bilingual education stipends and institutional assistance (OMB Cat. No. 13.403)	Elementary and Secondary Education Act Title VII	To train teachers administrators, and others working with bilingual education programs to recruit faculty and encourage reforms and improvements in bilingual education curriculums at the undergraduate and graduate levels	9,275,000	State education agencies local education agencies institutions of higher education (they may apply jointly)	OE Application Control Center (information from OE Office of Bilingual Education)
35 College library resources (OMB Cat. No. 13.406)	Higher Education Act Title II A	To strengthen postsecondary library resources	9,975,000[4]	Higher education institutions	OE Office of Libraries and Learning Resources
36 College Work-Study (OMB Cat. No. 13.463)	Higher Education Act Title IV C	To stimulate and promote part time employment of needy postsecondary students	509,800,000[4]	Higher education institutions, area vocational schools and proprietary institutions of higher education	OE Division of Student Financial Aid
37 Community service and continuing education programs (OMB Cat. No. 13.491)	Higher Education Act Title I	To strengthen higher education capabilities for helping communities solve their problems and to bring continuing education opportunities to adults	12,125,000[4]	Higher education institutions	State agencies or institutions designed to administer state plans (information from OE Division of Training and Facilities)
38 Cooperative education programs (OMB Cat. No. 13.510)	Higher Education Act Title VIII	To support planning and implementation of programs alternating periods of academic study and public or private employment	10,750,000[4]	Higher education institutions	OE Division of Training and Facilities
39 Cuban student loans (OMB Cat. No. 13.409)	Migration and Refugee Assistance Act	To provide a loan fund to aid Cuban refugee students	(transfer funds from other agencies)	Colleges and universities	OE Division of Student Financial Aid
40 Educational opportunity centers (OMB Cat. No. 13.543)	Higher Education Act Title IV	To operate centers assisting low-income persons desiring to pursue a program of postsecondary education	3,000,000[4]	Institutions of higher education and combinations of such institutions, public and private nonprofit agencies and organizations	OE Division of Student Financial Aid
41 Endowments to agriculture and mechanic arts colleges (OMB Cat. No. 13.453)	Bankhead Jones and Morrill Nelson Acts	To support instruction in agriculture and mechanic arts in land grant colleges	11,500,000	The 72 land grant colleges	OE Division of Training and Facilities
42 Improvement of postsecondary education (OMB Cat. No. 13.925)	Education Amendments of 1976	To aid postsecondary education reforms in curriculum development, teaching, and administration	11,500,000[4]	Postsecondary institutions and related organizations	Fund for the Improvement of Postsecondary Education (ASE)[5]
43 National Direct Student Loan Program (OMB Cat. Nos. 13.469,470,471)	Higher Education Act Title IV	To help set up funds at higher education institutions for making low-interest loans to graduate and undergraduate students attending at least half time	334,920,000[4]	Higher education institutions	OE Division of Student Financial Aid
44 National teaching fellowships and professors emeriti (OMB Cat. No. 13.454)	Higher Education Act Title III	To strengthen teaching resources of developing institutions	(included in 32)[4]	Institutions of higher education	OE Division of Institutional Development
45 State planning commissions (OMB Cat. No. 13.550)	Higher Education Act Sec. 1203	To develop statewide comprehensive planning for postsecondary education	3,500,000[4]	State commissions	State Planning Commissions Program Office
46 State student incentive grants (OMB Cat. No. 13.548)	Higher Education Act Title IV	To encourage states to increase their appropriations for grants to needy students or to develop such grant programs where they do not exist (grants are on a matching 50-50 basis)	44,000,000[4]	State education agencies	OE Division of Basic and State Student Grants
47 Student special services (OMB Cat. No. 13.482)	Higher Education Act Title IV	To assist low-income and handicapped students to complete postsecondary education	23,000,000[4]	Accredited institutions of higher learning or consortiums	HEW Regional Offices (information from OE Division of Student Services and Veterans Programs)
48 Supplemental education opportunity grants (OMB Cat. No. 13.418)	Education Amendments of 1972	To assist students of exceptional financial need to pursue a postsecondary education	240,093,000[4]	Higher education institutions	OE Division of Student Financial Aid
49 Talent Search (OMB Cat. No. 13.488)	Higher Education Act Title IV A	To help identify and encourage promising students to complete high school and pursue postsecondary education	6,000,000[4]	Higher education institutions and combinations of such institutions, public and private agencies and organizations	HEW Regional Offices (for information write to OE Division of Student Services and Veterans Program)
50 Undergraduate instructional equipment (OMB Cat. No. 13.518)	Higher Education Title VI A	To improve undergraduate instruction	7,500,000[4]	Higher education institutions, including vocational and technical schools and hospital schools of nursing	OE Office of Libraries and Learning Resources

TYPE OF ASSISTANCE	AUTHORIZING LEGISLATION	PURPOSE	APPROPRIATION (dollars)	WHO MAY APPLY	WHERE TO APPLY
51 Upward Bound (OMB Cat No 13.492)	Higher Education Act Title IV A	To motivate young people with low income backgrounds and inadequate high school preparation to enter postsecondary training	38,331,000[4]	Accredited higher education institutions and secondary or postsecondary schools capable of providing residential facilities	HEW Regional Offices (information from OE Division of Student Services and Veterans Program)
52 Veterans cost of instruction (OMB Cat No 13.540)	Higher Education Act Title IV	To encourage recruitment and counseling of veterans by postsecondary education institutions	23,750,000[4]	Higher education institutions	OE Veterans Program Branch
PART D—For the Education of the Handicapped					
53 Deaf blind centers (OMB Cat No 13.445)	Education of the Handicapped Act Part C Sec 622	To provide specialized intensive educational and therapeutic services to deaf blind children and their families through regional centers	16,000,000	Public or nonprofit private agencies organizations or institutions	OE Bureau of Education for the Handicapped
54 Early education for handicapped children (OMB Cat No 13.444)	Education of the Handicapped Act Part C Sec 623	To aid state and local education agencies in developing model preschool and early education programs for handicapped children	22,000,000	Public agencies and private nonprofit organizations	OE Bureau of Education for the Handicapped
55 Gifted and talented children (OMB Cat No 13.562)	Education Amendments of 1974 Special Projects Act Sec 404	To develop programs for gifted and talented children to train teachers and leadership personnel for these children	2,560,000	State and local education agencies higher education institutions appropriate nonprofit institutions or agencies	OE Bureau of Education for the Handicapped
56 Information and recruitment (OMB Cat No 13.452)	Education of the Handicapped Act Part D Sec 633	To encourage recruitment of educational personnel into special education to disseminate information to provide referral services for parents of handicapped children	1,000,000	Public or private nonprofit agencies organizations or institutions	OE Bureau of Education for the Handicapped
57 Media services and captioned film loan program—film (OMB Cat No 13.446)	Education of the Handicapped Act Part F	To advance the handicapped through film and other media including a captioned film loan service for cultural educational and vocational enrichment of the deaf	19,000,000 (includes 58 59 and II 16)	State or local public agencies schools and organizations which serve the handicapped their parents employers or potential employers	OE Bureau of Education for the Handicapped
58 Media services and captioned film loan program—centers (OMB Cat No 13.446)	Education of the Handicapped Act Part F as amended by PL 94-142	To establish and operate a system of centers on educational media for the handicapped	(included in 57)	Higher education institutions state and local education agencies nonprofit organizations	OE Bureau of Education for the Handicapped
59 Media services and captioned film loan program—research (OMB Cat No 13.446)	Education of the Handicapped Act Part F	To contract for research into the use of educational and training films and other media for the handicapped and for production and distribution	(included in 57)	Requests for proposals published in *Commerce Business Daily*	OE Bureau of Education for the Handicapped
60 Programs for children with specific learning disabilities (OMB Cat No 13.520)	Education of the Handicapped Act Part G	To provide for research and training and establishment of model centers for the early identification of children with learning disabilities	9,000,000	Higher education institutions state and local education agencies and other public and private nonprofit education and research organizations	OE Bureau of Education for the Handicapped
61 Programs for the handicapped—aid to states (OMB Cat No 13.449)	Education of the Handicapped Act Part B as amended by PL 94-142	To assist in initiation expansion and improvement of programs and projects for the handicapped at preschool elementary and secondary levels through grants to states and outlying areas	200,000,000[2]	State education agencies	OE Bureau of Education for the Handicapped
62 Programs for the handicapped in state supported schools (OMB Cat No 13.427)	Elementary and Secondary Education Act Title I Sec 121	To strengthen programs for children in state supported schools	111,433,451	Eligible state agencies	OE Bureau of Education for the Handicapped
63 Personnel training for the education of the handicapped (OMB Cat No 13.451)	Education of the Handicapped Act Part D	To prepare and inform teachers and others who educate handicapped children and to ensure an adequate supply of personnel in this area through preservice and inservice training	45,375,000 (includes 64)	State education agencies higher education institutions and appropriate nonprofit agencies	OE Bureau of Education for the Handicapped
64 Training of physical education and recreation personnel for handicapped children (OMB Cat No 13.451)	Education of the Handicapped Act Part D	To train physical education and recreation personnel to work with the handicapped	(included in 63)	Higher education institutions	OE Bureau of Education for the Handicapped
65 Regional education programs for the handicapped (OMB Cat No 13.560)	Education of the Handicapped Act Part C Sec 625	To make grants or contracts to publicly supported education institutions to develop and operate special education programs at vocational technical postsecondary or adult levels for deaf or other handicapped persons	2,000,000	Higher education institutions junior and community colleges vocational and technical institutes and other nonprofit education agencies	OE Bureau of Education for the Handicapped
66 Handicapped regional resource centers (OMB Cat No 13.450)	Education of the Handicapped Act Part C Sec 621	To establish regional resource centers that advise and offer technical services to educators for improving education of handicapped children	9,750,000	Higher education institutions state education agencies or combinations of such including local education agencies	OE Bureau of Education for the Handicapped
67 Severely handicapped projects (OMB Cat No 13.568)	Education of the Handicapped Act Part C Sec 621 and 624	To meet education and training needs of severely handicapped children and youths by helping them become as independent as possible	5,000,000	State departments of special education education agencies higher education institutions public and nonprofit private agencies professional organizations and volunteer associations	OE Bureau of Education for the Handicapped

TYPE OF ASSISTANCE	AUTHORIZING LEGISLATION	PURPOSE	APPROPRIATION (dollars)	WHO MAY APPLY	WHERE TO APPLY
68 Supplementary educational centers and services guidance counseling and testing for the handicapped (OMB Cat. No. 13.519)	Elementary and Secondary Education Act Title IV C	To provide vitally needed educational services in support of local innovative and exemplary projects in guidance counseling and testing	19,698,621[6]	State education agencies	OE Bureau of Education for the Handicapped
PART E—For Developing and Strengthening International Studies Programs					
69 Consultant services of foreign curriculum specialists (OMB Cat. No. 13.439)	Mutual Educational and Cultural Exchange Act and Agricultural Trade Development and Assistance Act (PL 83-480)	To bring foreign resource persons to the U.S. to assist in developing language and area programs pertinent to their home regions	325,000	Colleges, community colleges, consortiums, local and state education agencies, nonprofit education organizations	OE Division of International Education
70 Group projects abroad for non-Western language and area studies (OMB Cat. No. 13.440)	Mutual Educational and Cultural Exchange Act and PL 83-480 (in excess foreign currency countries)	To train U.S. education personnel abroad in language and international studies, to develop comprehensive language programs for U.S. institutions	919,710	Colleges, universities, consortiums, local and state education agencies, nonprofit education organizations	OE Division of International Education
71 International studies centers (OMB Cat. No. 13.435)	National Defense Education Act of 1958 Title VI	To upgrade training resources at Centers for International Studies, including foreign language and area studies	7,180,293	Higher education institutions	OE Division of International Education
72 International studies programs, graduate and undergraduate (OMB Cat. No. 13.435)	National Defense Education Act of 1958 Title VI	To encourage international studies resources at the graduate and undergraduate levels	1,279,707	Higher education institutions	OE Division of International Education
Part F—For Occupational, Adult, Vocational, and Career Education					
73 Adult education (OMB Cat. No. 13.400)	Adult Education Act	To provide adult basic education programs up to 12th grade competency	80,500,000[2]	State education agencies	OE Division of Adult Education through Regional Offices
74 Bilingual vocational training (OMB Cat. No. 13.558)	Vocational Education Act of 1963 Part J	To assist in conducting bilingual vocational training programs so that vocational training programs are available to everyone needing them	2,800,000[4]	State agencies, local education agencies, postsecondary institutions and other nonprofit organizations	OE Bureau of Occupational and Adult Education
75 Career education (OMB Cat. No. 13.554)	Education Amendments of 1974 Special Projects Act Sec. 406	To demonstrate effective methods and techniques in career education, to develop exemplary models and to enable state education agencies to plan for career education	10,135,000	State and local education agencies, higher education institutions, and other nonprofit organizations	OE Application Control Center (information from OE Office of Career Education)
76 Consumer and homemaking education (OMB Cat. No. 13.494)	Vocational Education Act of 1963 Part F	To help states conduct training programs in consumer and homemaking education, especially in economically depressed or high unemployment areas	40,994,000[4]	Local education agencies	State vocational education agencies
77 Cooperative education for vocational students (OMB Cat. No. 13.495)	Vocational Education Act of 1963 Part G	To help states conduct vocational education programs of cooperative work-study arrangements	19,500,000	Local education agencies	State vocational education agencies
78 Indian education (OMB Cat. No. 13.536)	Indian Education Act (PL 92-318) Title IV Part C (Sec. 314 Adult Education Act)	To provide adult basic education and GED programs for Indian adults	4,000,000	Indian tribes, organizations and institutions, state and local education agencies	OE Application Control Center (information from OE Office of Indian Education)
79 Vocational education—basic programs (OMB Cat. No. 13.493)	Vocational Education Act of 1963 Part B	To maintain, extend, and improve vocational education programs, to develop programs in new occupations	441,382,275[5]	Local education agencies	State vocational education agencies
80 Vocational programs for persons with special needs (OMB Cat. No. 13.499)	Vocational Education Act of 1963 Sec. 102(b)	To provide vocational education programs for disadvantaged persons who have not succeeded in regular programs	20,000,000[4]	Local education agencies	State vocational education agencies
81 Vocational education—state advisory councils (OMB Cat. No. 13.500)	Vocational Education Act of 1963 Sec. 104	To advise the state board for vocational education on the development and administration of state plans, to evaluate vocational education programs, services, and activities	4,316,000[5]	State advisory councils	OE Bureau of Occupational and Adult Education
82 Work-Study programs for vocational students (OMB Cat. No. 13.501)	Vocational Education Act of 1963 Part H	To provide work opportunities for full-time disadvantaged vocational education students	9,849,000[4]	Local education agencies	State vocational education agencies
Part G—For Desegregation Assistance					
83 Desegregation assistance grants to nonprofit organizations (OMB Cat. No. 13.529)	Emergency School Aid Act Title VII (PL 92-318)	To promote aid for community-based special programs and projects in support of school district desegregation plans	17,200,000	State and local education agencies, public and private nonprofit organizations, institutions, or agencies and combinations of the above	HEW Regional Offices, Office of Equal Educational Opportunity
84 Desegregation assistance, basic grants to LEAs (OMB Cat. No. 13.525)	Emergency School Aid Act Title VII (PL 92-318)	To provide aid to desegregating school districts for educational programs	137,600,000	Local public school districts	HEW Regional Offices, Office of Equal Educational Opportunity
85 Desegregation assistance, pilot programs (OMB Cat. No. 13.526)	Emergency School Aid Act Title VII (PL 92-318)	To help desegregating school districts provide special help in the form of reading and math programs to overcome minority group isolation	92,250,000	Local public school districts	HEW Regional Offices, Office of Equal Educational Opportunity

	TYPE OF ASSISTANCE	AUTHORIZING LEGISLATION	PURPOSE	APPROPRIATION (dollars)	WHO MAY APPLY	WHERE TO APPLY
86	Desegregation assistance bilingual programs (OMB Cat No 13528)	Emergency School Aid Act Title VII (PL 92 318)	To help desegregating school districts provide bilingual bicultural programs for children of limited English speaking ability	8 600 000	Local public school districts and private nonprofit organizations	HEW Regional Offices Office of Equal Educational Opportunity
87	Desegregation assistance educational TV (OMB Cat No 13530)	Emergency School Aid Act Title VII (PL 92 318)	To develop and produce integrated children's educational television programs	6 450 000	Public or private nonprofit organizations agencies or institutions	OE Application Control Center (information from OE Division of Special Projects Equal Educational Opportunity Programs)
88	Desegregation assistance special programs and projects (OMB Cat No 13532)	Emergency School Aid Act Title VII (PL 92 318)	To lessen minority group isolation by supporting efforts of special merit not covered under ESAA legislation	35 750 000	Local public school districts public and private nonprofit organizations	OE Application Control Center (information from OE Division of Special Projects Equal Educational Opportunity Programs)
89	ESAA evaluation (OMB Cat No 13531*)	Emergency School Aid Act Title VII (PL 92 318)	To evaluate programs and projects assisted under the Emergency School Aid Act	2 150 000	Private organizations institutions and agencies state education agencies and higher education institutions	Requests for proposals published in Commerce Business Daily
90	Desegregation assistance Civil Rights training and advisory services (OMB Cat No 13405)	Civil Rights Act of 1964 Title IV	To aid school districts in hiring advisory specialists to train employees and provide technical assistance in matters related to desegregation on the basis of race color religion sex national origin or language deficiencies	14 700 000	Local education agencies state education agencies colleges and universities and public or private nonprofit organizations	HEW Regional Offices Office of Equal Educational Opportunity
GROUP II: TO INDIVIDUALS—FOR TEACHER AND OTHER PROFESSIONAL TRAINING, AND STUDENT ASSISTANCE						
1	Basic educational opportunity grants (OMB Cat No 13539)	Higher Education Act Title IV	To provide financial assistance to undergraduate postsecondary students	1 506 000 000[4]	Postsecondary education students at eligible institutions	PO Box 84 Washington DC 20044
2	College teacher graduate fellowships (OMB Cat No 13407)	Elementary and Secondary Education Act Title VII	To train persons as bilingual education teacher trainers in universities and school districts	4 000 000	Graduate students enrolled on a full time basis in approved colleges and universities	Participating institutions of higher education (information from OE Office of Bilingual Education)
3	College teacher graduate fellowships (OMB Cat No 13407)	Higher Education Act Title IX	To increase the number of qualified college teachers	1 000 000[4]	Funds available only for those already enrolled in the program	Participating institutions (information from OE Division of Training and Facilities)
4	College Work Study (OMB Cat No 13463)	Higher Education Act Title IV C	To promote part time employment of postsecondary students in great financial need	(see 1 36)	Graduate undergraduate and vocational students enrolled at least half time in approved institutions	Participating institutions (information from OE Division of Student Financial Aid)
5	Cuban student loans (OMB Cat No 13409)	Migration and Refugee Assistance Act	To provide loans to needy Cuban refugee students	(transfer funds from other agencies)	Cubans who became refugees after January 1 1959	Participating institutions (information from OE Division of Student Financial Aid)
6	National direct student loans (OMB Cat No 13471)	Higher Education Act Title IV E	To provide low interest loans to postsecondary students	(see 1 43)	Graduate and undergraduate students enrolled half time	Participating institutions (information from OE Division of Student Financial Aid)
7	Domestic mining and mineral and mineral fuel conservation fellowships (OMB Cat No 13567)	Higher Education Act Title IX Part D	To assist graduate students in domestic mining and mineral and mineral fuel conservation including oil gas coal shale and uranium	3 000 000[4]	Advanced degree candidates	Participating institutions (information from OE Division of Training and Facilities)
8	Educational development (for educators from other countries)	Mutual Educational and Cultural Exchange Act	To provide opportunity for foreign educators to observe U S methods curriculum and organization at elementary secondary and higher education levels	(operated on transfer funds from the Department of State)	Educators from abroad (including administrators teacher trainers education ministry officials)	Bi national education commissions or foundations abroad (information from OE Division of International Education)
9	Ellender fellowships (OMB Cat No 13583*)	PL 92 506	To assist the Close Up Foundation of Washington D C with its program for increasing understanding of the federal government among secondary school students and their communities	750 000	Economically disadvantaged secondary school students and secondary school teachers	The Close Up Foundation 1054 Thomas Jefferson Street N W Washington DC 20007
10	Fellowships abroad for doctoral dissertation research in foreign language and area studies (OMB Cat No 13441)	Mutual Educational and Cultural Exchange Act	To develop research knowledge and international studies capabilities for specialized advanced work abroad	1 085 290	Prospective college and university teachers of language and area studies	Graduate dean of participating institutions (information from OE Division of International Education)
11	Fellowship opportunities abroad (OMB Cat No 13438)	Mutual Educational and Cultural Exchange Act and PL 83 480 (in excess foreign currency countries)	To promote instruction in international studies through grants and faculty projects for overseas work	640 000	Faculty in foreign languages and area studies	Institutions of higher education at which applicants are employed (information from OE Division of International Education)
12	Foreign language and area studies fellowships (OMB Cat No 13434)	National Defense Education Act of 1958 Title VI	To pay stipends to individuals undergoing training in any modern foreign language	3 990 000	Graduate students of foreign languages and area studies	Participating institutions (information from OE Division of International Education)
13	Guaranteed student loan program (OMB Cat No 13460)	Higher Education Act Title IV B	To encourage private commercial institutions and organizations to make loans to postsecondary students	(private capital is used for these loans)	Students accepted for enrollment on at least a half time basis in an eligible postsecondary institution	Private lenders

	TYPE OF ASSISTANCE	AUTHORIZING LEGISLATION	PURPOSE	APPROPRIATION (dollars)	WHO MAY APPLY	WHERE TO APPLY
14	Indian education (OMB Cat No 13569)	Indian Education Act Title IV Part B Sec 423	To assist Indian professional and graduate students in engineering medicine law business forestry and related fields	1 000 000	Indian students	OE Application Control Center (information from the OE Office of Indian Education)
15	Librarian training (OMB Cat No 13468)	Higher Education Act Title II B	To increase opportunities for training in librarianship	500 000[4]	Prospective and/or experienced librarians and information specialists	Participating institutions (information from OE Office of Libraries and Learning Resources)
16	Media services and captioned films training grants (OMB Cat No 13446)	Education of the Handicapped Act Part F	To train persons in the use of educational media for the handicapped	(see I 57)	Persons who will use captioned film equipment	OE Bureau of Education for the Handicapped
17	National teaching fellowships and professors emeriti (OMB Cat No 13454)	Higher Education Act Title III	To strengthen the teaching resources of developing institutions	(see I 32)	Highly qualified graduate students or junior faculty members from established institutions and retired scholars	OE Division of Institutional Development
18	Public service career fellowships (OMB Cat No 13555)	Higher Education Act Title IX Parts A and C	To attract and prepare students for entrance into state local or federal service	4 000 000[4]	Graduate students planning public service careers and institutions wanting to begin or expand public service programs	Participating institutions (information from OE Division of Training and Facilities)
19	State student incentive grants (OMB Cat No 13548)	Higher Education Act Title IV	To encourage states to increase their appropriations for students or to develop such grant programs where they do not exist (grants are on a 50 50 matching funds basis)	(see I 46)	Postsecondary education students	State education agencies (information from OE Division of Basic and State Student Grants)
20	Supplemental educational opportunity grants (OMB Cat No 13418)	Education Amendments of 1972	To assist students of exceptional financial need	(see I 48)	Postsecondary education students	Participating education institutions (information from OE Division of Student Financial Aid)
21	Teacher Corps project grants (OMB Cat No 13489)	Higher Education Act Title V	To improve the quality of instruction available to disadvantaged children	(see I 31)	Qualified undergraduate and graduate students	Participating institutions (information from OE Teacher Corps Office)
22	Training for the disadvantaged — CLEO (OMB Cat No 13556)	Higher Education Act Title IX	To provide opportunities for economically and educationally disadvantaged students to study and practice law	750 000	Eligible students with a bachelor s degree who plan to study law	Council on Legal Education Opportunity 818 18th Street N W Suite 940 Washington DC 20006
23	Teacher exchange (OMB Cat No 13437)	Mutual Educational and Cultural Exchange Act and PL 83 480	To promote international understanding and professional competence by exchange of teachers between the U S and foreign nations	(operated on transfer funds from Department of State)	Elementary and secondary school teachers college instructors and assistant professors	OE Division of International Education
24	Training of physical education and recreation personnel for handicapped children (OMB Cat No 13451)	Education of the Handicapped Act Title VI D	To train physical education and recreation personnel for the handicapped	(see I 63)	Qualified individuals at undergraduate and graduate levels	Participating institutions (information from OE Bureau of Education for the Handicapped)
25	Training teachers for the handicapped (OMB Cat No 13451)	Education of the Handicapped Act Part D	To improve and increase the supply of education personnel trained to work with handicapped children	(see I 63)	Qualified individuals with varying levels of education	Participating institutions (information from OE Bureau of Education for the Handicapped)
26	Vocational education personnel development awards (OMB Cat No 13503)	Higher Education Act Title V	To meet state needs for qualified vocational education personnel by making awards to educators and institutions	10 000 000[4]	Current and prospective vocational educators	State vocational education agencies
27	Vocational education professional personnel development for states (OMB Cat No 13504)	Higher Education Act Title V	To strengthen education programs authorized by the Vocational Education Amendments of 1968 to improve instruction and administration of vocational education at all levels	(included in II 25)	Professional personnel in vocational education	State vocational education agencies

GROUP III: FOR RESEARCH

1	Consumer education (OMB Cat No 13564)	Elementary and Secondary Education Act Sec 811	To support research and development and pilot projects designed to provide consumer education to the public	$ 135 000	State and local education agencies higher education institutions libraries public and private groups	OE Office of Consumer Education
2	Foreign language and area studies research (OMB Cat No 13436)	National Defense Education Act Title VI	To improve foreign language and area studies through support of research and studies experimentation and development of specialized instructional materials	850 000	Higher education institutions state education agencies other organizations and individuals	OE Division of International Education
3	Handicapped physical education and recreation research (OMB Cat No 13443)	Education of the Handicapped Act Part E	To improve physical education and recreation programs for handicapped children through research and demonstration projects	(see III 5)	Higher education institutions state or local education agencies public or private education or research groups	OE Bureau of Education for the Handicapped
4	Library demonstrations (OMB Cat No 13475)	Higher Education Act Title II B	To promote library and information science research and demonstrations	1 000 000[4]	Higher education institutions and other public or private nonprofit agencies institutions and organizations	OE Office of Libraries and Learning Resources
5	Research and demonstration for the handicapped (OMB Cat No 13443)	Education of the Handicapped Act Part E	To improve educational opportunities of handicapped children through research and demonstration projects	11 000 000	Higher education institutions state or local education agencies public or private educational or research groups	OE Application Control Center (information from OE Bureau of Education for the Handicapped)

	TYPE OF ASSISTANCE	AUTHORIZING LEGISLATION	PURPOSE	APPROPRIATION (dollars)	WHO MAY APPLY	WHERE TO APPLY
6	Vocational education curriculum development (OMB Cat. No. 13.496)	Vocational Education Act of 1963, Part I	To develop standards and curriculums in all occupational fields and disseminate materials for teaching occupational subjects	1,000,000[4]	State and local education agencies, colleges and universities, profit and nonprofit groups	OE Application Control Center (information from OE Division of Vocational and Technical Education)
7	Vocational education research (OMB Cat. No. 13.498)	Vocational Education Act of 1963, Sec. 131(a) of Part C	To conduct applied studies and development in vocational education	6,750,000[5]	State boards, higher education institutions, public and private nonprofit agencies and institutions, local education agencies	OE Application Control Center (information from OE Division of Vocational and Technical Education)
8	Vocational education research—meeting vocational needs of youth (OMB Cat. No. 13.498)	Vocational Education Act of 1963, Sec. 131(b) of Part C	To conduct applied studies and development in vocational education	6,750,000[5]	State boards of vocational education	State education agencies
9	Vocational education research—innovative projects (OMB Cat. No. 13.502)	Vocational Education Act of 1963, Part D	To develop and operate exemplary projects as models for vocational education programs	8,000,000[4]	Education agencies, private institutions and organizations	OE Application Control Center (information from OE Division of Vocational and Technical Education)
10	Vocational education research—relating school curriculums to careers (OMB Cat. No. 13.502)	Vocational Education Act of 1963, Part D	To stimulate new methods for relating school work to occupational fields and public education to manpower agencies	8,000,000[4]	State boards of education, local education agencies, public and private agencies and institutions	State education agencies
11	Women's educational equity program research (OMB Cat. No. 13.565)	Education Amendments of 1974, Special Projects Act, Sec. 408	To support development and implementation of programs which contribute to women's educational equity and have a possible national impact	(see I.22)	Public agencies, private nonprofit organizations, and individuals	OE Women's Program Staff, Office of the U.S. Commissioner of Education
GROUP IV. FOR CONSTRUCTION						
1	Public schools (OMB Cat. No. 13.477)	School Aid to Federally Impacted and Major Disaster Areas, (PL 81-815)	To aid school districts in federally impacted areas in providing minimum school facilities and to aid school districts suffering disaster damages	25,000,000	Local school districts	HEW Regional Offices (information from OE Division of School Assistance in Federally Affected Areas)
2	Vocational facilities (OMB Cat. No. 23.012)	Appalachian Regional Development Act of 1965	To construct area vocational education facilities in the Appalachian region	(transfer funds from Appalachian Regional Commission)	State education agencies in the Appalachian region	OE Division of Vocational and Technical Education

The following programs were authorized for the first time by the Education Amendments of 1976. At presstime, their appropriations and regulations were still pending.

1	Lifelong learning (OMB Cat. No. not assigned)	Higher Education Act, Title I	To plan, assess, and coordinate projects related to lifelong learning	(still pending)	State agencies, higher education institutions, public and private nonprofit organizations	Assistant Secretary for Education
2	Strengthening research library resources (OMB Cat. No. not assigned)	Higher Education Act, Title II	To promote research and education of higher quality throughout the U.S. by providing financial assistance to major research libraries	(still pending)	Qualifying public or private nonprofit library institutions	OE Office of Libraries and Learning Resources
3	Educational information centers (OMB Cat. No. not assigned)	Higher Education Act, Title IV-A	To pay the federal share for planning, establishing, and operating Educational Information Centers offering information, guidance, counseling, and referral services for all individuals, including individuals residing in rural areas	(still pending)	Higher education institutions, public and private agencies and organizations, and local education agencies in combination with a higher education institution	Institutions should apply to states; states should apply to OE Division of Student Services and Veterans Programs
4	Job location and development program (OMB Cat. No. not assigned)	Higher Education Act, Title IV-I	To establish or expand a program for locating or developing jobs for students suitable to their needs and schedules	(program will allow institutions to use 10 percent of college work-study funds)	Higher education institutions	OE Division of Student Financial Aid
5	Student financial assistance training (OMB Cat. No. not assigned)	Higher Education Act, Title IV-I	To develop programs to increase the proficiency of institutional and state financial aid administrators in all aspects of student financial aid	(still pending)	States providing matching funds	OE Division of Student Financial Aid
6	Teacher centers (OMB Cat. No. not assigned)	Higher Education Act, Title V-B	To assist local education agencies in planning, establishing, and operating teacher centers for curricular and inservice training	(still pending)	Local education agencies	Apply through state education agencies (information from OE Office of Teacher Corps)
7	Training for higher education personnel (OMB Cat. No. not assigned)	Higher Education Act, Title V-B	To train qualifying persons to serve as faculty or staff in higher education	(still pending)	Higher education institutions	OE Division of Training and Facilities
8	Guidance and counseling (OMB Cat. No. not assigned)	Education Amendments of 1974, Title III, Part D	To assist states in carrying out programs, projects, and leadership activities designed to expand and strengthen counseling and guidance services in elementary and secondary schools	(still pending)	State education agencies	OE Division of Educational Replication Task Force on Part D

[1]Refers to identifying number as it appears in the Office of Management and Budget Catalog of Federal Domestic Assistance. Where asterisk (*) appears, the identifying number is not official but for OE's internal use only.
[2]Amounts shown represent advance funding from FY 76.
[3]Includes 10 percent set aside for non-LEAs (local education agencies).
[4]Amount shown is FY 76 level. FY 77 appropriation was deferred due to lack of authorizing legislation when bill was considered. However, continuing resolution allows expenditure at last year's level.
[5]Administered by the Assistant Secretary for Education, another component of the Education Division.
[6]Included in $184,521,852 available for Educational Innovation and Support (item 15)—approximately 15 percent set aside for the funds appropriated after deducting state administration.
[7]For 1976-77 academic year; individual awards should range from $200 to $1,400.
[8]For the 1977-78 school year.

Appendix B

OFFICE OF EDUCATION PROGRAMS, BY LEVEL OF CONTROLLABILITY

Category A: relatively non-controllable under realistic political circumstances (i.e., direct repeal of basic authorization or point of order language needed not to fund).

ESEA Title I -- State programs
SAFA Section 6
Vocational education: permanent
Land Grant colleges: permanent
NDSL Teacher cancellations
HEFA Annual and permanent fellowship *continuations*, including:
- Library training
- Vocational training
- Bilingual training
- Handicapped training
- Indian training
- College personnel training
- Language training
- SSIG

(these programs are defined as those identified at the Federal level by specific recipient, for a specific program and a fixed, multi-year period)

Category B: formula grant programs based on participation; entitlements are non-controllable (based on applications which OE cannot restrict without changing the basic authorization); individual projects are ranked by quality and fully funded in rank-order up to funds available.

Education Broadcast Facilities
SAFA Construction

Category C: formula grant programs based on participation; entitlements are non-controllable.

as in B; OE has no discretion as to which of the technically-acceptable projects to fund, but rateable reductions can be made as long as all eligible projects in the class are funded.

SAFA Maintenance and operations by tier
Indian Education, Part A
Handicapped State Grants
Handicapped Pre-school incentive
(Handicapped: Deaf-Blind Centers)
BOGS
Veterans-Cost-of-Instruction

Category D: formula grant programs based on population rather than participation; rateable reductions can be made as long as all eligible projects in the class are funded.

ESEA Title I LEA grants (minus evaluations and hold harmless)
Part 4 consolidations
ESAA (minus evaluations and special competition projects)

Vocational education (minus permanent authorization and Part J)
Adult Basic Education
SEOG
College Work Study
NDSL: new Federal capital contributions and loans to institutions
SSIG: new awards
HEA 1
College libraries
Library Training: new awards
LSCA 1 and 3

Category E: discretionary
RULE: Same as FY 1978 request or 1978 House Allowance, whichever is higher

Bilingual Education*
Right to Read
Drug Abuse Education
Follow-through
Environmental Education
Ellender Fellowships
Ethnic Heritage Studies
Special Programs for Indian Children*
Special Programs for Indian Adults
Civil Rights Training and Advisory Services
Education for the Handicapped:
  Severely Handicapped Projects
  Specific Learning Disabilities
  Early Childhood Education
  Regional, Vocational, Adult, and Postsecondary Education
Innovation and Development
Media Services and Captioned Films
Regional Resource Centers
Recruitment and Information
Special Education Manpower Development*
Bilingual Vocational Training
Special Programs for the Disadvantaged (TRIO)
Graduate/Professional Educational Opportunities
Strengthening Developing Institutions
NDEA Centers and Research
NDEA Fellowships
Fulbright-Hayes Training
Cooperative Education
Personnel Development
Special Projects and Training -- All except
  Information Clearinghouses
  (Teacher Corps*)
Educational Activities Overseas

Category F: administrative

Program Administration
Indian Education: administration
Information Clearinghouses
Advisory councils (including bilingual)
Mandated studies

** Excludes continuation costs which are included under Category A.*

Appendix C

ANALYSIS OF VOCATIONAL EDUCATION ENROLLMENT DATA, BY SEX, IN FISCAL YEARS 1972 AND 1975

Enrollment in vocational education by sex was again collected in Fiscal Year 1975 after having been suspended since Fiscal Year 1972. Delaware, Illinois, Maine, Rhode Island, South Carolina, American Samoa, Guam, and the Trust Territory were not able to supply the data. In addition, California did not provide the data by occupational program. Accordingly, in order to compare Fiscal Year 1975 data with Fiscal Year 1972, enrollments in the above States were excluded.

As indicated in Table C-1, the percentage of total enrollment which is female declined from 55.4 percent to 48.3 percent. To a large extent this decrease is attributable to the small enrollment of females in industrial arts and volunteer firemen programs (included in special programs) which were added since Fiscal Year 1972. Another factor probably is the increased proportion of males in consumer and homemaking programs and in office occupation programs, two of the largest programs.

A comparison of enrollment by occupational program shows a decided shift away from sex-role stereotyping. In the male-dominant occupational programs of agriculture, distribution, technical, and trades and industry, the increase of females was greatest in agriculture, increasing from 5.4 percent to 9.2 percent. In trades and industry the increase of females was from 11.7 percent to 12.6 percent and in technical from 9.8 percent to 10.7 percent. In distribution and special programs, which enrolled slightly more males than females in Fiscal Year 1972, there was a decrease of female enrollment from 45.3 percent to 42.8 percent and 44.7 percent to 26.7 percent, respectively. In the female-dominant occupational programs, i.e., health, consumer and homemaking, occupational home economics, and office occupations, there was a significant increase in male enrollments. In health occupations the percentage of male enrollment increased from 15.3 percent to 28.3 percent. In occupational home economics, the increase of males was from 13.9 percent to 26.8 percent. In consumer and homemaking, the increase of males was from 7.9 percent to 18.1 percent. (In office occupations the increase of males was from 23.6 percent to 30.7 percent.)

TABLE C-1

ENROLLMENT DISTRIBUTION BY SEX
FISCAL YEARS 1972 AND 1975

	1975			1972
	Total[a]	Female	Percent Female	Percent Female
Total Enrollment	13,372,896	6,464,315	48.3	55.4
Agriculture[b]	873,649	79,948	9.2	5.4
Distribution	701,825	300,196	42.8	45.3
Health	507,955	364,278	71.7	84.7
Consumer & Homemaking	2,886,474	2,364,108	81.9	92.[illegible]
Occup. Home Economics	329,377	241,103	73.2	86.1
Office	2,108,180	1,460,391	69.3	76.4
Technical	341,062	36,455	10.7	9.8
Trades and Industry	2,267,881	285,486	12.6	11.7
Special Programs	1,770,245	478,395	26.7	44.7

[a] *Total enrollment, less Delaware, Illinois, Maine, Rhode Island, South Carolina, American Samoa, Guam, and Trust Territory, which did not provide data by sex.*

[b] *Less California in occupational programs.*

TABLE C-2

PERCENTAGE DISTRIBUTION BY OCCUPATIONAL PROGRAM OF FEMALE ENROLLMENT
FISCAL YEARS 1972 AND 1975

Occupational Program	1975		1972		1969	
	No. of Females	Percent Female	No. of Females	Percent Female	No. of Females	Percent Female
Total[a]	5,610,360	100.0	6,472,967	100.0	4,435,077	100.0
Agriculture	79,948	1.4	48,153	0.7	16,709	0.4
Distribution	300,196	5.4	290,020	4.5	250,726	5.7
Health	364,278	6.5	285,071	4.4	161,492	3.6
Consumer & Homemaking	2,364,108	42.1	2,916,987	45.1	2,229,825	50.3
Occup. Home Economics	241,103	4.3	240,948	3.7	98,219	2.2
Office	1,460,391	26.0	1,796,387	27.8	1,430,833	32.3
Technical	36,455	0.6	33,006	0.5	27,535	0.6
Trades and Industry	285,486	5.1	279,680	4.3	191,150	4.3
Special Programs	478,395	8.5	582,715	9.0	28,588	0.6

[a] *Total enrollment, less California, Delaware, Illinois, Maine, Rhode Island, South Carolina, American Samoa, Guam, and Trust Territory, which did not provide data by sex.*

Appendix D

P.L. 92-318 (1972) and P.L. 93-568 (1974) Rules and Regulations	State Assurance	YES	NO
§ 86.8 Designation of responsible employees and adoption of grievance procedures.			
(a) Designation of responsible employee. Each recipient shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under this part, including any investigation of any complaint communicated to such recipient alleging any actions which would be prohibited by this part. The recipient shall notify all its students and employees of the name, office address and telephone number of the employees appointed pursuant to this paragraph.	An employee has been appointed to coordinate compliance efforts. All students and employees have been notified of the designated employee		

P.L. 92-318 (1972) and P.L. 93-568 (1974) Rules and Regulations	State Assurance	YES	NO
(b) Complaint procedures of recipient. A recipient shall adopt and publish grievance procedures providing for prompt and equitable resolution of student and employee complaints alleging any action which would be prohibited by this part. (Secs. 901. 902. Education Amendments of 1973. 88 Stat. 373, 374 30 U.S.C. 1631, 1632)	Grievance procedures have been adopted and published.		

P.L. 92-318 (1972) and P.L. 93-568 (1974)

Rules and Regulations	State Assurance	YES	NO
§ 86.9 Dissemination of policy (a) Notification of policy. (1) Each recipient shall implement specific and continuing steps to notify applicants for admission and employment, students and parents of elementary and secondary school students, employees, sources of referral of applicants for admission and employment, and all unions or professional organizations holding collective bargaining or professional agreements with the recipient that it does not discriminate on the basis of sex in the educational programs or activities which it operates, and that is required by title IX and this part not to discriminate in such a manner.	*Applicants for admission and sources of referral of applicants for admission have been and will continue to be notified that the recipient does not discriminate on the basis of sex. *The statement includes: a) employment practices and policies b) admission policies c) notice of the established grievance procedures		

P.L. 92-318 (1972) and P.L 93-568 (1974)

Rules and Regulations	State Assurance	YES	NO
Such notification shall contain such information, and be made in such manner, as the Director finds necessary to apprise such persons of the protections against discrimination assured them by title IX and this part, but shall state at least that the requirement not to discriminate in education programs and activities extends to employment therein, and to admission thereto unless Subpart C does not apply to the recipient, and that inquiries concerning the application of title IX and this part to such recipient may be referred to the employee designated pursuant to § 86.8, or to the Director. (2) Each recipient shall make the initial notification required by paragraph (a)(1) of this section within 90 days of the effective date of this part or of the date this part first applies to such recipient, whichever comes later, which notification shall	*Initial notification appeared: (a) in local newspapers (b) newspapers and magazines operated by the recipient or by students, alumni and alumnae groups (c) annual memoranda		

P.L. 92-318 (1972) and P.L. 93-568 (1974)

Rules and Regulations	State Assurance YES	NO
include publication in: (i) Local newspapers; (ii) newspapers and magazines operated by such recipient or by student, alumnae, or alumni groups for or in connection with such recipient; and (iii) memoranda or other written communications distributed to every student and employee of such recipient. (b) Publications. (1) Each recipient shall prominently include a statement of the policy described in paragraph (a) of this section in each announcement, bulletin, catalog, or application form which it makes available to any person of a type described in paragraph (a) of this section or which is otherwise used in connection with the recruitment of students or employees.	*The statement is included in announcements, bulletins, catalogs, or application forms made available to persons or groups mentioned above.	

P.L. 92-318 (1972) and P.L. 93-568 (1974)

Rules and Regulations	State Assurance YES	NO
(2) A recipient shall not use or distribute a publication of the type described in this paragraph which suggests, by text or illustration, that such recipient treats applicants, students, or employees differently on the basis of sex except as such treatment is permitted by this part. (c) Distribution. Each recipient shall distribute without discrimination on the basis of sex each publication described in paragraph (b) of this section, and shall apprise each of its admission and employment recruitment representatives of the policy of nondiscrimination described in paragraph (a) of this section, and require such representatives to adhere to such policy. (Secs. 901,902, Education Amendments of 1972, 86 Stat. 373, 374; 20 U.S.C. 1681, 1682)	*Publications covered in (2) (b) (being used or distributed) have been examined to determine if they suggest by text or illustration that applicants, students, or employees are treated differently on the basis of sex. *Discriminatory publications have been revised or dissemination stopped. *Materials are distributed in a non-discriminatory manner. *Admissions, recruitment, counseling, advisory, personnel representatives are required to adhere to the non-discriminatory policies.	

SAMPLE REPORT

MANAGEMENT EVALUATION REVIEW FOR COMPLIANCE
(86.9a1) (MER Page 6) State Response: X Yes ___No

Applicants for admission and employment, and sources of referral of applicants for admission have been and will continue to be notified that the recipient does not discriminate on the basis of sex. The statement includes: (a) employment practices and policies; (b) admission policies; (c) notice of the established grievance procedures.

FINDINGS:

The State is in compliance.

A statement regarding non-discrimination in employment is contained in the Affirmative Action Plan, dated August 1, 1975.

A compliance and assurance statement was sent to each applicable agency to complete concerning employment practices.

All catalogs, bulletins, and course announcements are being revised for the 1976-77 school year.

EVIDENCE:

Affirmative Action Plan, dated August 1, 1975.
State Newspaper notice, Arkansas Gazette.

RECOMMENDATIONS:

None

FOLLOW-UP:

None

MANAGEMENT EVALUATION REVIEW FOR COMPLIANCE
(86.9a2) (MER Page 6) State Response: X Yes ___No

Initial notification appeared: a) in local newspapers; b) newspapers and magazines operated by the recipient or by students, alumni and alumnae groups; c) annual memoranda.

FINDINGS:

The State is in compliance.

Notice of student grievance procedures sent to vocational students in 23 postsecondary institutions and 4 high school vocational programs. State Department has sent a notice of the employee grievance and appeal procedure to each State Department employee.
Each local school system has its own grievance procedures. (State Department has no direct control over this grievance procedure. The State Department notified each school district of their reponsibility in this area.)

EVIDENCE:

A student grievance procedure notice dated May 10, 1976, was sent to every student in postsecondary and area vocational schools which are State funded.

Notice in State newspaper, Arkansas Gazette.

RECOMMEDATIONS:

None

FOLLOW-UP:

None

MANAGEMENT EVALUATION REVIEW FOR COMPLIANCE
(86.9b1) (MER Page 6) State Response: X Yes ___No

A statement of non-discrimination on the basis of sex is included in announcements, bulletins, or application forms made available to students, alumni, alumnae, or in annual memoranda.

FINDINGS:

The State is in compliance.

All catalogs, bulletins, etc., are being reviewed for discriminatory content. Revisions will be made where necessary. Office of the Associate Director for Personnel Management is monitoring this activity.

EVIDENCE:

State newspaper notice, Arkansas Gazette.

RECOMMENDATIONS:

None

FOLLOW-UP:

None

Appendix E

APPENDIX E

BOAE Proposal for Training and Assisting Program Monitors

ADMINISTRATIVE IMPROVEMENT ACTIVITY IN AREA OF SEX-ROLE STEREOTYPING
PROPOSED BY DIVISION OF RESEARCH AND DEMONSTRATION

PROBLEM	RECOMMENDED SOLUTION	CLEARANCES NEEDED FROM ASSOCIATE COMMISSIONER	ULTIMATE DISSEMINATION ANTICIPATED	ANTICIPATED SIDE BENEFITS OF THE ACTIVITY
Part D. Regional project officers do not feel comfortable with monitorship of Part D. projects for sex bias and sex-role stereotyping.	1. Development of a guide to include an instrument on which sex bias and sex-role stereotyping in a project may be quantified. 2. Inservice training in the recognition of sex bias and sex-role stereotyping and the application of the instrument thereto. 3. Clarification of the role of the project officer in monitoring for sex bias and sex-role stereotyping including specification of reasonable action/nonaction anticipated of project officers when these problems are encountered in a Part D project. 4. Evaluation of improvement realized as indicated on pre-post semantic differential by Regional project officers and increased monitorship activity reflected in evaluation site visit reports.	1. Permission to convene multi-unit advisory group, including Office of Civil Rights representation, and other representation of the NACVE and the ACWEP. 2. Willingness to consider eventual policy statement with respect to Item 3, under Recommended Solution.	1. Anticipate use only as an in-house document. 2. Propose dissemination as an "information only" document to State and local Part D project administrators.	1. Establish a precedent among U.S. Office of Education discretionary programs for the monitorship of sex bias and sex-role stereotyping as a program. 2. Make a significant contribution to the efforts of the Women's Education Equity Program staff to encourage this kind of activity throughout the U.S. Office of Education. 3. Encourage and provide leadership for State-level vocational education administrators who must respond to new requirements of the Education Amendments of 1976 with respect to opportunities for women in vocational education. 4. Strengthen the position of the Bureau of Occupational and Adult Education in its documentation of activities for the improvement of women's opportunities through vocational education.

Appendix F

OFFICE OF EDUCATION - REGION VI

OBJECTIVE AND OPERATING PLAN

Date Prepared: September 29, 1976

Organization: Office of Education

Bureau or Division: Occupational and Adult Education Sub-Unit

Objective No. 3 : SEX-BIAS: To design and implement a series of strategies and activities to substantially reduce sex-bias and sex-role stereotyping in non-traditional vocational subject areas.

Overall Evaluation

Status Report for the Month of _____

MILESTONES	COMPLETION DATES
	O N D J F M A M J J A S
1. Assess and collect current data and enrollment statistics in non-traditional subject areas for five states.	
2. Prepare regional report to states giving emphasis to program divisions and elements requiring attention and services to impact on Title IX.	
3. Amend monitoring instruments to include review of Title IX requirements.	
4. Include, as agenda topic, interpretation of Title IX, Rules and Regulations in at least two regional conferences of State Vocational Education Staffs.	
5. Contact and give technical assistance to at least four Instructional Material Laboratories on methods and practices to remove sex-role stereotyping from publications.	
6. Monitor administrative practices in at least two states to assure compliance with Title IX.	
7. Collect and disseminate notable examples and procedures employed by states and LEA's in removing barriers to training and employment in non-traditional vocational subject areas.	

Office of Education
OBJECTIVE AND OPERATING PLAN
Fiscal Year 1977

Date Prepared: _____

Entity : DCOAE

Bureau : BOAE, DAE

Program
Objective # _____ To eliminate sex bias and sex-role stereotuping in State adult education programs.

Program $_____

S & E $_____

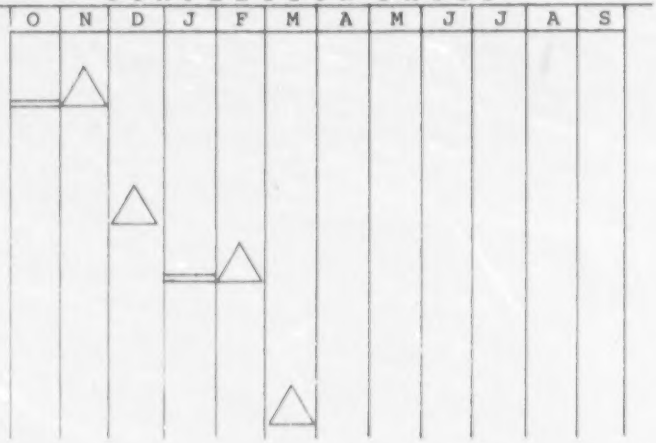
Operational
Objective # _____ In order to reduce sex bias and sex-role stereotyping in State adult education programs, provide guidance to States in identifying and eliminating sex bias and sex-role stereotyping in planning and developing adult education programs.

Staff Time: 204 days / _____

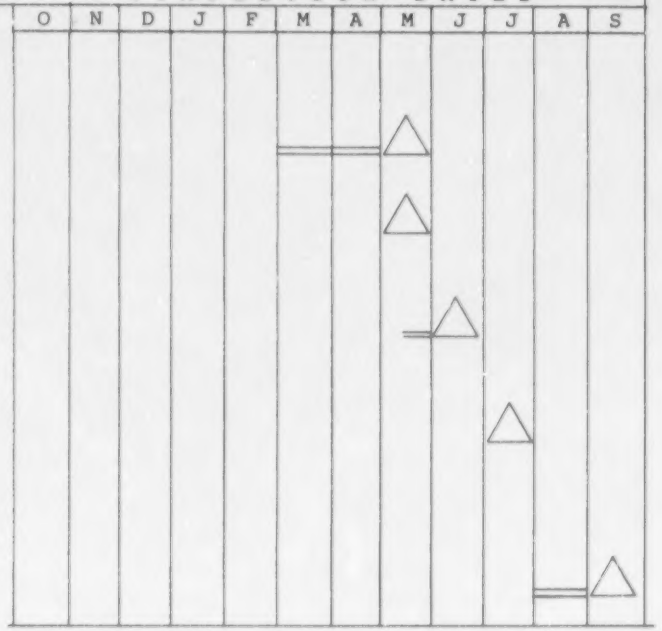
Overall Evaluation

Status Report for Month(s) of _____

	MILESTONES	COMPLETION DATES
02/01/01	Analyze and report 10 to 20 examples of sex roles and stereotyping in State and local CBE programming.	
02/01/02	Establish characteristics and criteria for sex-bias-free competency-based instructional programs.	
02/01/03	Devise procedures for reviewing and developing sex-bias-free competency-based instructional programs.	
02/01/04	Provide criteria and procedures to Regional Program Officers at RPO meeting.	



	MILESTONES	COMPLETION DATES



02/01/05 Develop in collaboration with regional and State personnel a draft "characteristics of quality sex-bias-free competency-based instructional programs."

02/01/06 Obtain from State and Regional personnel written feedback.

02/01/07 Prepare final version of "characteristics of quality sex-bias-free competency based instructional programs."

02/01/08 Issue "characteristics of quality sex-bias-free competency-based instructional programs."

02/01/09 Convene one day training session for regional, State and local personnel in utilization of "characteristics of quality sex-bias-free competency-based instructional programs."

Appendix G

APPENDIX G

List of People Interviewed

Key: USOE -- United States Office of Education
NIE -- National Institute of Education
DHEW -- Department of Health, Education and Welfare

Name	Position	Date of Interview
Kelly Acosta	Director, Postsecondary Programs Office of Bilingual Education USOE	2/8/77
Albert L. Alford	Assistant Commissioner, Office of Legislation USOE	10/5/76
Harold W. Arberg	Director, Arts and Humanities Staff USOE	10/8/76
Iris Bailey	Staff Assistant, Office of External Relations USOE	10/14/76
John Baird	Deputy Director, Right to Read USOE	10/8/76
Jack L. Billings	Acting Assistant Commissioner for Public Affairs Office of Public Affairs USOE	10/6/76
George Brown	Senior Statistician PVAB National Center for Educational Statistics DHEW	6/2/476
Thomas J. Burns	Associate Commissioner for State and Local Educational Programs USOE	10/14/76
Lois-ellin Datta	Assistant Director, Education and Work Group NIE	2/3/77

Harold Delaney	Associate Director, Education Equity Group NIE	8/9/76
Laura L. Dittmann	Education Specialist Office of Child Development DHEW	12/13/76
Joan E. Duval	Director, Women's Program Staff USOE	10/7/76
John W. Evans	Deputy Commissioner, Office of Planning USOE	10/15/76
Herman R. Goldberg	Associate Commissioner for Equal Educational Opportunity Programs USOE	10/6/76
Lois E. Hartman	Director, Personnel and Training Division USOE	3/2/77
Dick Hays	Associate Commissioner, Director, Office of Libraries and Learning Resources USOE	10/26/76
S.W. Herrell	Associate Deputy Commissioner, Bureau of Postsecondary Education USOE	10/13/76
Elam K. Hertzler	Ombudsman to State Education Agencies USOE	10/5/76
Kenneth Hoyt	Director, Office of Career Education USOE	10/15/76
Barbara Kemp	President, AFGE Local 2607	2/13/77
B. Ann Kleindienst	Director, Office of Special Concerns DHEW	11/18/76

Name	Position	Date of Interview
Jean Lipman-Blumen	Director, Women's Research Program NIE	12/6/76
Ann M. Martin	Associate Commissioner for Occupational Planning Bureau of Occupational and Adult Education USOE	2/22/77
Edwin W. Martin, Jr.	Deputy Commissioner, Bureau of Education for the Handicapped USOE	10/7/76
William E. McLaughlin	Assistant Commissioner, Regional Liaison USOE	10/5/76
John Meier	Director, Office of Child Development DHEW	12/13/76
Arthur Melmed	Head, Postsecondary Finance and Organization Programs Staff Finance and Productivity NIE	8/5/76
John C. Molina	Director, Office of Bilingual Education USOE	10/8/76
S. Gabe Paxton, Jr.	Deputy Commissioner, Office of Indian Education USOE	10/7/76
Florence Perman	Director, Federal Women's Program DHEW	11/23/76
James R. Robinson	Director (Acting), Head Start Bureau DHEW	12/13/76
John H. Rodriguez	Associate Commissioner for Compensatory Education Programs USOE	10/14/76

Name	Position	Date of Interview
Ernest Russell	Associate Director, Administration and Management NIE	8/9/76
Rebecca Schergens	Deputy Assistant Secretary for Education (Policy Communications) Office of the Assistant Secretary for Education	11/17/76
Michael Smith	Branch Chief, Data Requirements and Products NIE	8/6/76
William L. Smith	Director, Teacher Corps USOE	10/14/76
Leonard H. O. Spearman	Deputy Commissioner, Bureau of Postsecondary Education USOE	10/26/76
Thomas Stitch	Associate Director, Basic Skills Group NIE	8/9/76
Leroy Walser	Director, Postsecondary Programs Division Office of Bilingual Education USOE	2/7/77
Robert R. Wheeler	Deputy Commissioner, Bureau of Elementary and Secondary Education USOE	10/14/76
Saul Yanofsky	Chief, Program Operations School Capacity for Problem Solving NIE	8/6/76
Edward T. York, Jr.	Deputy Commissioner, Office of Management USOE	10/26/76

Appendix H

KEY DOCUMENTS REVIEWED

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